

# Exhibit C

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

MASTER FILE NO. 07-cv-5944 SC

**DIRECT PURCHASER PLAINTIFFS'  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT LG ELECTRONICS, INC.'S  
FIRST SET OF INTERROGATORIES**

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

PROPOUNDING PARTY: LG ELECTRONICS, INC.

RESPONDING PARTY: DIRECT PURCHASER PLAINTIFFS

SET NO.: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the Direct purchaser Plaintiffs ("Plaintiffs" or "DPPs"), by their attorneys, object and respond to Defendant LG Electronics, Inc.'s First Set of Interrogatories to the Direct Purchaser Plaintiffs (the "Interrogatories") as follows:

**GENERAL OBJECTIONS**

Each of the following objections is incorporated by reference into each of the responses

MDL NO. 1917

1 herein:

2       1. Plaintiffs generally object to the Interrogatories, including the Instructions and  
 3 Definitions, to the extent they purport to enlarge, expand or alter in any way the plain meaning and  
 4 scope of any interrogatory or to impose any obligations on Plaintiffs' responses in excess of those  
 5 required by the Federal Rules of Civil Procedure. Plaintiffs will respond to these Interrogatories  
 6 in accordance with their understanding of the obligations imposed by the Federal Rules of Civil  
 7 Procedure.

8       2. Plaintiffs object to the unduly burdensome and unfair nature of Defendants'  
 9 Interrogatories to the extent they seek to have counsel for Plaintiffs present evidentiary support of  
 10 the Direct Purchaser Plaintiffs' Consolidated Amended Complaint" (March 16, 2009) (Dkt. No.  
 11 436) ("DP-CAC") without completing discovery. Defendants' Interrogatories are premature,  
 12 unduly burdensome and unfair, and serve no other purpose but to harass and delay Plaintiffs in  
 13 their efforts to prepare their case.

14       3. Plaintiffs object to each of Defendant's Interrogatories, Definitions and Instructions  
 15 to the extent they seek documents or information (i) not relevant to the subject matter of this  
 16 action; (ii) not relevant to any claim or defense in this action; (iii) not reasonably calculated to lead  
 17 to the discovery of admissible evidence; (iv) different from, inconsistent with, or in addition to  
 18 what is required to be produced under the Federal Rules of Civil Procedure, the Civil Local Rules  
 19 of the United States District Court for the Northern District of California, any existing Court Order  
 20 in this case, or any other applicable rule or law.

21       4. Plaintiffs object to the Interrogatories to the extent that they impose an undue  
 22 burden on Plaintiffs by, for example, requiring Plaintiffs to search for documents: (a) the value of  
 23 which, if any, is substantially outweighed by the burden or cost of searching for them, or (b) that  
 24 are equally available to Defendant or already in Defendant's possession.

25       5. Plaintiffs object to the Interrogatories to the extent they call for information and/or  
 26 documents protected by the attorney-client privilege, the work product doctrine, or any other  
 27 applicable privilege or protection. This objection includes, but is not limited to, information that

1 Defendant seeks regarding communications between Plaintiffs' attorneys and/or between Plaintiffs  
 2 and their attorneys made during or in anticipation of litigation. Inadvertent identification or  
 3 production of any such information in a document shall not constitute a waiver of any such  
 4 privilege with respect to the document produced or the subject matter thereof, or a waiver of the  
 5 Plaintiffs' right to object to the use of any such document during trial or any subsequent  
 6 proceeding. To the extent that any such protected information is inadvertently produced in  
 7 response to the Interrogatories, the production of such information shall not constitute a waiver of  
 8 Plaintiffs' right to assert the applicability of any privilege or immunity to the information, and any  
 9 such document and all copies or images thereof shall be promptly returned, sequestered or  
 10 destroyed upon demand pursuant to Fed. R. Civ. P. 26(b)(5)(B).

11       6.       Plaintiffs object to the Interrogatories as premature "contention interrogatories."  
 12 *See In re Convergent Technologies Securities Litig.*, 108 F.R.D. 328 (N.D. Cal. 1985) ("[t]here is  
 13 considerable recent authority for the view that the wisest general policy is to defer propounding  
 14 and answering contention interrogatories until near the end of the discovery period."); *In re Ebay  
 15 Seller Antitrust Litig.*, No. C07-1882 JF (RS), 2008 WL 5212170 (N.D. Cal. Dec. 11, 2008)  
 16 ("Courts using their Rule 33(a)(2) discretion generally disfavor contention interrogatories asked  
 17 before discovery is undertaken."). The Interrogatories: (i) call for opinions and contentions  
 18 relating to fact or application of law to fact that Plaintiffs should not be required to disclose until  
 19 discovery has been substantially completed; (ii) call for legal conclusions; and (iii) are likely to  
 20 require supplemental answers, prematurely commit Plaintiff to positions, and artificially narrow  
 21 issues. Such information cannot be fairly and practically provided until after the completion of  
 22 discovery. The interests of judicial economy and efficiency dictate that contention discovery is  
 23 more appropriate after a substantial amount of merits discovery has been conducted. To the extent  
 24 that Defendant's Interrogatories request the contentions of Plaintiffs in this case, those contentions  
 25 are set forth in large part in the DP-CAC. The allegations of the DP-CAC are incorporated by  
 26 reference in each of the answers to the Interrogatories set forth herein. In responding to  
 27 Defendant's contention interrogatories pursuant to Court Order, Plaintiffs reserve their rights to  
 28

1 supplement these responses at any time prior to the final pre-trial conference herein.

2       7. Plaintiffs object to the Interrogatories to the extent they purport to require Plaintiffs  
3 to disclose information or produce documents concerning any expert or other person or entity  
4 retained by counsel to assist in the preparation of the Plaintiffs' case: (a) to the extent any such  
5 person or entity will not be designated by the Plaintiffs as a trial witness on the ground that such  
6 disclosure is neither relevant nor reasonably calculated to lead to the discovery of admissible  
7 evidence; and (b) on the grounds that any such present disclosure is prejudicial to the Plaintiffs'  
8 preparation of this case and is not required by the Federal Rules of Civil Procedure.

9        8. Plaintiffs object to the Interrogatories, including the Instructions and Definitions, to  
10 the extent the information sought is protected by the attorney-client privilege, the attorney work  
11 product doctrine, or is otherwise privileged and/or immune from discovery. By responding to  
12 these Interrogatories, Plaintiffs do not waive, intentionally or otherwise, any attorney-client  
13 privilege, attorney work-product or any other privilege, immunity or other protection that may be  
14 asserted to protect any information from disclosure. Accordingly, any response or production of  
15 documents or disclosure of information inconsistent with the foregoing is wholly inadvertent and  
16 shall not constitute a waiver of any such privilege, immunity or other applicable protection.

17 9. Plaintiffs object to the Interrogatories to the extent they fail to state with sufficient  
18 particularity the information and categories of information to be provided.

19 10. Plaintiffs object to the Interrogatories to the extent they request Plaintiffs to  
20 produce documents outside their possession, custody, or control.

21        11. Plaintiffs object to the Interrogatories to the extent they are overly broad and  
22 unduly burdensome.

23 12. Plaintiffs object to the Interrogatories to the extent they are vague or ambiguous.

24 13. Plaintiffs object to the Interrogatories to the extent they require Plaintiffs to draw  
25 legal conclusions.

26 14. Plaintiffs object to the Interrogatories to the extent the information requested is  
27 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

1       15. Plaintiffs object to Defendant's Interrogatories on the basis that Plaintiffs have not  
 2 yet had an opportunity to complete substantial discovery in this action, and no Defendant  
 3 depositions or other significant depositions have been taken. Thus, discovery is far from  
 4 complete. Under the circumstances, Defendant's Interrogatories are premature, and the responses  
 5 to the Interrogatories are not complete and are subject to full discovery in the case. Plaintiffs  
 6 reserve the right to modify their allegations based on additional discovery, additional analysis of  
 7 existing discovery, discovery not yet completed and/or expert discovery, and Plaintiffs reserve the  
 8 right to supplement and/or delete the responses given in light of further evidence and further  
 9 analysis of present and subsequently acquired evidence.

10       16. In addition, in accordance with the Federal Rules of Civil Procedure, Plaintiffs  
 11 reserve the right to introduce evidence not yet identified herein supporting Plaintiffs' allegations,  
 12 including evidence that Plaintiffs expect to further develop through the course of discovery and  
 13 expert analysis. Plaintiffs reserve the right to supplement or modify any information, contention  
 14 or analysis herein, including evidentiary materials as a result of expert analysis or discovery in this  
 15 action.

16       17. Plaintiffs' Responses set forth herein are made without in any way waiving: (a) all  
 17 rights to object to these Interrogatories, the Responses, or the subject matter thereof, as to the  
 18 competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose, in  
 19 any proceeding in, or at the trial of, this or any other action; (b) the right to object on any ground  
 20 to the use of these Responses, or the subject matter thereof, in any proceeding in, or at the trial of,  
 21 this or any other action; or (c) the right to object on any ground at any time to requests to admit,  
 22 Interrogatories, or other discovery procedures involving or relating to the subject matter of these  
 23 Requests.

24       18. Plaintiffs object to each Interrogatory to the extent that the information or facts  
 25 sought are contained in Plaintiffs' Consolidated Amended Complaint or publicly available  
 26 sources.

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19. In providing responses to the Interrogatories, Plaintiffs reserve all objections as to  
2 competency, relevance, materiality, privilege, or admissibility as evidence in any subsequent  
3 proceeding in, or trial of, this or any other action for any purpose whatsoever.

4 20. No incidental or implied admissions are intended in these responses. Plaintiffs'  
5 response to all or any part of any Interrogatory should not be taken as an admission that: (a)  
6 Plaintiffs accept or admit the existence of any fact(s) set forth or assumed by the Interrogatory; or  
7 (b) Plaintiffs' responses constitute admissible evidence. Plaintiffs' response to all or any part of an  
8 Interrogatory also is not intended to be, and shall not be, a waiver by Plaintiffs of all or any part of  
9 their objection(s) to that interrogatory.

## **RESPONSES**

**11 | INTERROGATORY NO. 1:**

12 State with specificity the factual basis (including any evidentiary sources) for Your  
13 allegation that Defendants conspired, combined and contracted to fix, raise, maintain, and stabilize  
14 the price at which computer monitors containing CRTs were sold in the United States, as alleged  
15 in, inter alia, Paragraph 3 of the Complaint.

## 16 | RESPONSE TO INTERROGATORY NO. 1:

17 Subject to the General Objections, Plaintiffs respond as follows:

## I. INTRODUCTION.

19 Pursuant to the Special Master’s “Report And Recommendations Regarding Discovery  
20 Motions” (Nov. 18, 2010) (“R&R”) (Dkt. No. 810), *adopted by the Court in* “Order Adopting  
21 Special Master’s Report Recommendations And Tentative Rulings Regarding Discovery” (Dec. 8,  
22 2010) (Dkt. No. 826), the following narrative, prepared by counsel for the Direct Purchaser  
23 Plaintiffs (“DPPs”), is intended to respond to the following discovery requests, which include this  
24 one: (1) “LGE’s First Set of Requests for Production to the Direct Purchaser Plaintiffs” (March 8,  
25 2010); (2) “LGE’s First Set of Interrogatories To The Direct Purchaser Plaintiffs” (March 8,  
26 2010); (3) “The First Set of Interrogatories of Defendant MT Picture Display Co., Ltd. To The  
27 Direct Purchaser Plaintiffs” (March 8, 2010); and (4) “The First Set of Document Requests of

1 Defendant MT Picture Display Co., Ltd. To The Direct Purchaser Plaintiffs" (March 8, 2010),  
 2 which are referred to at pp. 1-2 & n.1 of Defendants' letter brief on their motion to compel  
 3 answers to interrogatories and document requests to the DPPs concerning Cathode Ray Tube  
 4 ("CRT") Products ("Defs.' Br.") and are appended as Exhibit A thereto. The DPPs have restated  
 5 herein and incorporate by reference (to the extent not restated) all the objections to these discovery  
 6 request contained in: (1) "Direct Purchaser Plaintiffs' Responses To LGE's First Set of Requests  
 7 for Production to the Direct Purchaser Plaintiffs" (May 7, 2010); (2) "Direct Purchaser Plaintiffs'  
 8 Responses To LGE's First Set of Interrogatories To The Direct Purchaser Plaintiffs" (May 7,  
 9 2010); (3) "Direct Purchaser Plaintiffs' Responses To The First Set of Interrogatories of  
 10 Defendant MT Picture Display Co., Ltd. To The Direct Purchaser Plaintiffs" (May 7, 2010); and  
 11 (4) "Direct Purchaser Plaintiffs' Responses To The First Set of Document Requests of Defendant  
 12 MT Picture Display Co., Ltd. To The Direct Purchaser Plaintiffs" (May 7, 2010), appended as  
 13 Exhibit C to Defs.' Br.

14 Several prefatory comments are required with respect to this narrative response.

15 *First*, in the R&R, the Special Master made it clear that he was only asking the DPPs to  
 16 provide information available to them as of March 16, 2009, the date on which the DP-CAC was  
 17 filed. As the Special Master stated,

18  
 19 Nor does this requested discovery impose an undue burden on plaintiffs. They are  
 20 not being asked to search through voluminous historical files and records. When  
 21 they prepared their complaints they had necessarily gathered some information  
 22 with respect to their allegations, and they should have that information available.

23 R&R, p. 6.

24 *Second*, this temporal limit has ramifications for how the DPPs respond to the propounded  
 25 discovery. As of March 16, 2009, the DPPs had received *no* documents from Defendants  
 26 Chunghwa Picture Tubes, Ltd. ("Chunghwa PT") and Chunghwa Picture Tubes Malaysia Sdn.  
 27 Bhd (collectively "Chunghwa" or "CGW"). What had been given to them before the filing of the  
 28 DP-CAC was an *oral proffer* by Chunghwa's counsel at which some documents in Chunghwa's  
 possession were quoted to the DPPs' counsel, but no electronic or hard copies of those documents

1 were given to the latter. Indeed, Chunghwa produced *no* documents to DPPs' counsel until *March*  
 2 *8, 2010*, when it made a production to all parties in the case. As a result, the DPPs will not be  
 3 providing citations to documents produced by Chunghwa, because they did not possess them prior  
 4 to the filing of the DP-CAC.<sup>1</sup> The DPPs believe that documents produced by Chunghwa after the  
 5 filing of the DP-CAC (as well as documents produced by other Defendants) further support their  
 6 contentions regarding CRT Products, but the terms of the R&R do not require the DPPs to sort  
 7 through the voluminous productions and provide that information.

8       *Third*, while this narrative response will refer to various conspiratorial meetings described  
 9 by Chunghwa's counsel at the oral proffer, the latter made it clear that their proffer was confined  
 10 to meetings attended by representatives of Chunghwa. It is clear that there were other  
 11 conspiratorial meetings not attended by such representatives, as reflected, for example, in  
 12 documents produced by various Samsung entities in September through November of 2010.  
 13 Again, however, no discussion of these documents is contained in this narrative response.

14       *Fourth*, the Special Master noted that the discovery was relevant "[u]nder any of three  
 15 scenarios--one conspiracy alleging both CRT Products and CRTs, one conspiracy for CRTs and  
 16 one for CRT Products, or a conspiracy for CRTs which merely *impacted* the prices for CRT  
 17 Products....." R&R at 5; emphasis in original. The Special Master is correct that it is not necessary  
 18 to decide at this juncture which of these three scenarios is applicable here; the DPPs could recover  
 19 damages under any of them. Moreover, as the DPPs have made clear throughout this case, the DP-  
 20 CAC is intended to describe the first of these scenarios--a unitary conspiracy that encompasses  
 21 both CRTs and CRT Products (including finished products, primarily televisions and computer  
 22 monitors) manufactured and sold by Defendants. *See, e.g.*, Transcript of Hearing of October 5,  
 23 2009 at 78-89, attached as Exhibit 1 to the "Declaration of Jeffrey A. Kessler" (Feb. 19, 2010)  
 24 (Dkt. No. 621); Transcript of Hearing of November 12, 2010 at 28-31. In answering these  
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26       <sup>1</sup> To the extent references are made in this response to publicly available materials, the DPPs are  
 27 providing citations to websites where they may be found.

1 contention interrogatories, the DPPs will respond with respect to the conspiracy that they alleged  
 2 in the DP-CAC, not the one Defendants seek to define. However, even assuming *arguendo* that  
 3 the focus of the conspiracy was on CRTs, to the extent that Defendants incorporated the price-  
 4 fixed component in finished CRT Products that they then sold, they fixed the prices of those  
 5 products as well. *See Section III.D, infra.* To constitute horizontal price-fixing, the agreement  
 6 among competitors need not directly concern the final or total prices charged to customers;  
 7 agreements to fix *any* element of price have been held to constitute *per se* unlawful price-fixing of  
 8 the product or service at issue. *See Catalano, Inc. v. Target Sales, Inc.*, 446 U.S. 643, 645, 648  
 9 (1980); *Northwestern Fruit Co. v. A. Levy & J. Zentner Co.*, 665 F.Supp. 869, 871 (E.D. Cal.  
 10 1986). As the United States Supreme Court explained sixty years ago in *United States v. Socony -*  
 11 *Vacuum Oil Co.*, 310 U.S. 150, 223-24 (1940) (citations omitted):

12 Under the Sherman Act a combination formed for the purpose and with the effect  
 13 of raising, depressing, fixing, pegging, or stabilizing the price of a commodity in  
 14 interstate or foreign commerce is illegal *per se*. Where the machinery for price-  
 15 fixing is an agreement on the prices to be charged or paid for the commodity in  
 16 the interstate or foreign channels of trade, the power to fix prices exists if the  
 17 combination has control of a substantial part of the commerce in that commodity.  
 18 Where the means for price-fixing are purchases or sales of the commodity in a  
 19 market operation or, as here, purchases of a part of the supply of the commodity  
 20 for the purpose of keeping it from having a depressive effect on the markets, such  
 21 power may be found to exist though the combination does not control a  
 22 substantial part of the commodity. In such a case that power may be established if  
 23 as a result of market conditions, the resources available to the combinations, the  
 24 timing and the strategic placement of orders and the like, effective means are at  
 25 hand to accomplish the desired objective. But there may be effective influence  
 26 over the market though the group in question does not control it. Price-fixing  
 27 agreements may have utility to members of the group though the power possessed  
 28 or exerted falls far short of domination and control. Monopoly power is not the  
 only power which the Act strikes down, as we have said. Proof that a combination  
 was formed for the purpose of fixing prices and that it caused them to be fixed or  
 contributed to that result is proof of the completion of a price-fixing conspiracy  
 under § 1 of the Act.

23 In a footnote, the Court went on to explain (*id.* at 224 n.59 (citations omitted)):

24 In view of these considerations a conspiracy to fix prices violates § 1 of the Act  
 25 though no overt act is shown, though it is not established that the conspirators had  
 26 the means available for accomplishment of their objective, and though the  
 27 conspiracy embraced but a part of the interstate or foreign commerce in the  
 28 commodity. Whatever may have been the status of price-fixing agreements at  
 common law, the Sherman Act has a broader application to them than the  
 common law prohibitions or sanctions. Price-fixing agreements may or may not  
 be aimed at complete elimination of price competition. The group making those

1 agreements may or may not have power to control the market. But the fact that the  
 2 group cannot control the market prices does not necessarily mean that the  
 3 agreement as to prices has no utility to the members of the combination. The  
 4 effectiveness of price-fixing agreements is dependent on many factors, such as  
 5 competitive tactics, position in the industry, the formula underlying price policies.  
 6 Whatever economic justification particular price-fixing agreements may be  
 7 thought to have, the law does not permit an inquiry into their reasonableness.  
 8 They are all banned because of their actual or potential threat to the central  
 9 nervous system of the economy. The existence or exertion of power to accomplish  
 10 the desired objective becomes important only in cases where the offense charged  
 11 is the actual monopolizing of any part of trade or commerce in violation of § 2 of  
 12 the Act, 15 U.S.C.A. § 2. An intent and a power to produce the result which the  
 13 law condemns are then necessary. As stated in *Swift & Co. v. United States*, 196  
 14 U.S. 375, 396, 25 S.Ct. 276, 279, 49 L.Ed. 518, ‘\* \* \* when that intent and the  
 15 consequent dangerous probability exist, this statute, like many others, and like the  
 16 common law in some cases, directs itself against that dangerous probability as  
 17 well as against the completed result.’ But the crime under § 1 is legally distinct  
 18 from that under § 2 though the two sections overlap in the sense that a monopoly  
 19 under § 2 is a species of restraint of trade under § 1. Only a confusion between the  
 20 nature of the offenses under those two sections would lead to the conclusion that  
 21 power to fix prices was necessary for proof of a price-fixing conspiracy under § 1.

11 **II. RELEVANT INFORMATION OBTAINED FROM THE ORAL PROFFER BY**  
**12 CHUNGHWA.**

13 The information provided by Chunghwa consisted of an overview of the CRT industry,  
 14 detailed descriptions of each participant in the alleged conspiracy of which Chunghwa was aware,  
 15 an explanation of how the alleged conspiracy worked over time, and a description of the times  
 16 and places of, and attendees at, various meetings in Asia in which representatives of Chunghwa  
 17 participated. As noted above, there were meetings in Asia that Chunghwa did not attend. There  
 18 were also meetings in geographic regions other than Asia that Chunghwa did not attend, because it  
 19 had no operations in those regions.

20 **A. Scope Of The Alleged Conspiracy.**

21 The unitary conspiracy alleged in the DP-CAC encompassed: (a) color picture tubes (“CPTs”),  
 22 which are CRTs used in color televisions and similar devices; (b) color display tubes (“CDTs”),  
 23 which are CRTs used in color computer monitors or similar devices; and (c) electronic devices  
 24 containing CPTs (such as televisions) or CDTs (such as computer monitors).

25 With respect to CRT Products, Defendants or their agents agreed, *inter alia*, to: (a) fix  
 26 target prices and price guidelines; (b) exchange pertinent information on, *inter alia*, shipments,  
 27 prices, production, and customer demand; (c) coordinate public statements regarding available

1 capacity and supply; (d) resolve issues created by asymmetrical vertical integration among some  
 2 of the co-conspirators; (e) keep their collusive meetings secret; (f) expose cheating on the  
 3 agreements and to discuss the reconciliation of accounts; (g) allocate market share of overall sales;  
 4 (g) influence and, at times, coordinate pricing with producers in other geographic areas; (h) limit  
 5 competition for certain key customers; (i) allocate customers; (j) allocate each producer's share of  
 6 certain key customers' sales; and (k) restrict output.

7       The conspiracy alleged in the DP-CAC began in 1995 and initially consisted of bilateral  
 8 meetings between various Defendants. The first report Chunghwa had of a bilateral meeting was  
 9 one that occurred on March 3, 1995. The bilateral meetings continued until at least March of 2006.  
 10 Over 240 such bilateral meetings occurred during the Class Period identified in the DP-CAC  
 11 (March 1, 1995 through November 25, 2007). As noted earlier, representatives of Chunghwa did  
 12 not attend every meeting. The meetings took various forms and were attended by different  
 13 individuals of the respective Defendant companies or corporate families. The bilateral meetings  
 14 encompassed: (1) information exchanges between working level sales or marketing; (2) meetings  
 15 between the senior sales management or senior company management intended to resolve disputes  
 16 arising out of a failure to reach agreements or intended to follow up on group meeting discussions;  
 17 and (3) meetings between the employees of a company who regularly attended group meetings,  
 18 and employees of a company who did not, for the purpose of coordination.

19       *Ad hoc* multilateral meetings in furtherance of the unitary conspiracy alleged in the DP-  
 20 CAC commenced in 1995. There is a report of one such meeting in 1995, and three such meetings  
 21 in 1996. Beginning in 1997, more regular and systematic group meetings began occurring. Over  
 22 260 such meetings occurred during the Class Period. Again, Chunghwa did not attend all of these  
 23 meetings. At some point, these meetings became known as "Glass Meetings" or "GSM." In  
 24 general, the types of meetings were:

25

26       **"Top Meetings"** – meetings held by individuals at highest level of the company.  
 27 These happened less frequently, typically quarterly and were focused on longer  
 term agreements and dispute resolution. Top Meetings occurred in South Korea,  
 Taiwan, and China.

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1       **“Management Meetings”** – meetings held by high-level sales executives. These  
 2       meetings occurred more frequently, typically monthly, and handled  
 3       implementation of agreements made at Top Meetings. Management level  
 4       meetings occurred in South Korea, Taiwan, China, Indonesia, Japan, and  
 5       Thailand.

6       **“Working Level Meetings”** – lower level sale and marketing employees meet to  
 7       exchange data and discuss pricing. Working level meetings occurred in South  
 8       Korea, Taiwan, and China.

9       **“Green Meetings”** – meetings on golf courses.<sup>2</sup>

10      There were distinct Glass Meetings with respect to CPTs and CDTs, although many of the  
 11     participants overlapped. Initially, the CPT and CDT meetings were held back to back at the same  
 12     locations. At meetings held on May 23, 2000, the attendees raised confidentiality concerns about  
 13     the information discussed at meetings, so the participants agreed that CPT and CDT meetings  
 14     would be held on separate days and that limits would be placed on the number of attendees,  
 15     starting after June 2000 meeting. The last CPT group meeting attended by Chunghwa occurred in  
 16     February of 2007. The group was scheduled to meet again on April 5 and 6, 2007, but Chunghwa  
 17     did not attend this meeting.

18      **B. Participants In The Alleged Conspiracy**

19      The participants in the unitary conspiracy alleged in the DP-CAC included: Chunghwa  
 20     (and through it, Tatung Corporation); Thai-CRT Co., Ltd. (“Thai CRT”); the Daewoo Group  
 21     (partly through its subsidiaries DOSA and Orion Electric Co. (“Orion”)) (“collectively  
 22     “Daewoo”); Beijing Matsushita Color Display Co. (“BMCC”); Matsushita Toshiba Picture  
 23     Display Co., Ltd. (“MTPD”); Samtel Color, Ltd. (“Samtel”); and entities that are or were part of  
 24     the Hitachi, Toshiba, Samsung, LG Electronics, Panasonic (formerly Matsushita), Philips, and  
 25     Irico corporate families.<sup>3</sup> Those Defendants who are part of specific corporate families are referred

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26      <sup>2</sup> These meetings also occurred in Europe and Latin America; Chunghwa did not attend the latter,  
 27     because it had no operations in that region. The meetings in Europe will be referred to herein as  
 28     “Europe Meetings.” These meetings also included multilateral meetings in China that will be  
 29     referred to herein as “China meetings.”

30      <sup>3</sup> The LG entities included LG. Philips Displays, which later became LP Displays International,  
 31     L.P. (collectively “LPD”).

1 to collectively in the DP-CAC by the name of that corporate family and those collective references  
 2 are incorporated in this narrative response. *See* DP-CAC ¶¶ 36, 40, 45, 50, 57, 67, 78. As  
 3 explained in the DP-CAC at paragraph 154:

4 When Plaintiffs refer to a corporate family or companies by a single name in their  
 5 allegations of participation in the conspiracy, it is to be understood that the  
 6 Plaintiffs are alleging that one or more employees or agents of entities within the  
 7 corporate family engaged in conspiratorial meetings on behalf of every company  
 8 in that family. In fact, the individual participants in the conspiratorial meetings  
 9 and discussions did not always know the corporate affiliation of their  
 10 counterparts, nor did they distinguish between the entities within a corporate  
 11 family. The individual participants entered into agreements on behalf of, and  
 12 reported these meetings and discussions to, their respective corporate families. As  
 13 a result, the entire corporate family was represented in meetings and discussions  
 14 by their agents and was parties to the agreements reached in them. For the various  
 15 meeting participants identified below, in many instances, their high-ranking  
 16 executives participated in a significant number of the meetings described.

17 **Chunghwa** participated in over 240 illegal bilateral and over 260 illegal group meetings  
 18 between 1995 and 2007 (summarized in the grid below) in which unlawful agreements as to, *inter*  
 19 *alia*, price, output restrictions, and customer and market allocation of CRT Products occurred.  
 20 These meetings took place in Southeast Asia, China, Europe and Scotland. Among the  
 21 representatives of Chunghwa who participated in these meetings were C.Y. Lin, C.C. Liu, Michael  
 22 Du, Tony Cheng, and Christina Hsieh.

23 **Daewoo** participated in multiple illegal bilateral and at least several dozen group meetings  
 24 from 1996 to 2004 in which unlawful agreements as to, *inter alia*, price, output restrictions, and  
 25 customer and market allocation of CRT Products occurred. These included at least four bilateral  
 26 meetings, 15 Top Meetings, 17 Management Meetings, 57 Glass Meetings, 15 Working Level  
 27 meetings, 22 China Meetings, five Europe Meetings, one audit and four Green Meetings. These  
 28 meetings occurred in China, South Korea, Malaysia, Taiwan, Thailand, and the U.K. Among the  
 executives who attended these meetings on behalf of the Daewoo corporate family were H.C.  
 Moon and Karl Min.

29 **Hitachi** participated in over a dozen illegal bilateral and group meetings from 1996  
 30 through at least 2001 in which unlawful agreements as to, *inter alia*, price, output restrictions, and  
 31 customer and market allocation of CRT Products occurred. These included at least two bilateral  
 32

1 meetings, five Management Meetings, two Glass Meetings, one Working Level meeting, and 22  
 2 China Meetings. These meetings took place in Taiwan and China.

3 **Irico** participated in multiple illegal bilateral and at least several dozen illegal group  
 4 meetings from 1998 to 2006 in which unlawful agreements as to, *inter alia*, price, output  
 5 restrictions, and customer and market allocation of CRT Products occurred. These included at  
 6 least eight bilateral meetings, 31 China Meetings, and two Europe Meetings. These meetings took  
 7 place in China and Europe. Among the executives who attended these meetings on behalf of the  
 8 Irico corporate family were Ma Jinquan and Chao Wang.

9 **LG** participated in more than a dozen illegal bilateral and more than a hundred illegal  
 10 group meetings from 1995 to 2006 ((including its participation through LPD) in which unlawful  
 11 agreements as to, *inter alia*, price, output restrictions, and customer and market allocation of CRT  
 12 Products occurred. These included at least four bilateral meetings, 19 Top Meetings, 33  
 13 Management Meetings, 114 Glass Meetings, 17 Working Level meetings, 25 China Meetings, two  
 14 Europe Meetings, one audit and 17 Green Meetings. These meetings took place in Taiwan, South  
 15 Korea, Indonesia, Thailand, Singapore, Malaysia, and China. Among the executives who attended  
 16 these meetings on behalf of the LG corporate family were Jim Smith, K.S. Cho, S.Y. Choi, and  
 17 C.G. Kim.

18 **Panasonic** participated in several dozen illegal bilateral and group meetings from 1996  
 19 through at least 2006 in which unlawful agreements as to, *inter alia*, price, output restrictions, and  
 20 customer and market allocation of CRT Products occurred. These included at least 43 bilateral  
 21 meetings, one Glass Meeting, and one Working Level Meeting. These meetings took place in  
 22 Taiwan, Malaysia, and China.

23 **Philips** participated in over 100 illegal bilateral and group meetings from 1996 through  
 24 2007 (including its participation through LG. Philips Display Co. (Later LP Display, Inc.)  
 25 ("LPD")) in which unlawful agreements as to, *inter alia*, price, output restrictions, and customer  
 26 and market allocation of CRT Products occurred. These included at least four bilateral meetings,  
 27 17 Top Meetings, 32 Management Meetings, 98 Glass Meetings, 19 Working Level meetings, 35  
 28

1 China Meetings, eight Europe Meetings, and 16 Green Meetings. These meetings occurred in  
 2 South Korea, Taiwan, China, Malaysia, Japan, Singapore, Thailand, Indonesia, Scotland, and  
 3 various locations in Europe. Among the executives who attended these meetings on behalf of the  
 4 Philips corporate family were Jim Smith, Jerry Lin, S.Y. Choi, and C.G. Kim.

5 **Samsung** participated in hundreds of illegal bilateral and illegal group meetings from 1995  
 6 through at least 2006 in which unlawful agreements as to, *inter alia*, price, output restrictions, and  
 7 customer and market allocation of CRT Products (including CDT Products and CPT Products)  
 8 occurred. These included at least 77 bilateral meetings, 22 Top Meetings, 35 Management  
 9 Meetings, 121 Glass Meetings, 20 Working Level meetings, 38 China Meetings, three Europe  
 10 Meetings, four audits and 17 Green Meetings. These meetings occurred in South Korea, Taiwan,  
 11 China, Malaysia, Japan, Singapore, Thailand, the United Kingdom, and various locations in  
 12 Europe. Among the Samsung executives who attended these meetings on behalf of the Samsung  
 13 corporate family were Inn Kim and Deok Yon Kim.

14 **Thai CRT** participated in over 50 illegal bilateral and group meetings between 1998 and  
 15 2006 in which unlawful agreements as to, *inter alia*, price, output restrictions, and customer and  
 16 market allocation of CPT Products occurred. These included at least five bilateral meetings, five  
 17 Management Meetings, 40 Glass Meetings, one Working Level meeting, one China Meeting, and  
 18 one Green Meeting. These meetings occurred in Taiwan, South Korea, Thailand, Malaysia,  
 19 Indonesia, Singapore, and China. Among the executives who attended these meetings on behalf of  
 20 the Thai CRT corporate family were Chaovalit Ekabut and Thamasak Chaiyavech.

21 **BMCC** participated in at over 20 illegal bilateral group meetings between 1998 and 2007  
 22 in which unlawful agreements as to, *inter alia*, price, output restrictions, and customer and market  
 23 allocation of CRT Products occurred. These included at least one bilateral meeting and 28 China  
 24 Meetings. These meetings occurred in China.

25 **MTPD** participated in at several dozen illegal bilateral and group meetings between 2003  
 26 and 2006 in which unlawful agreements as to, *inter alia*, price, output restrictions, and customer  
 27 and market allocation of CPT Products occurred. These included at least 24 Glass Meetings. These  
 28

1 meetings occurred in Malaysia, Thailand, Singapore, Taiwan, and Indonesia. Among the MTPD  
 2 executives who attended these meetings on behalf of the Panasonic and Toshiba corporate families  
 3 was Kazuteru Yasakawa.

4 **Toshiba** participated in over 50 illegal bilateral and group meetings between 1995 and  
 5 2006 (including its participation through MTPD) in which unlawful agreements as to, *inter alia*,  
 6 price, output restrictions, and customer and market allocation of CRT Products occurred. These  
 7 included at least 50 bilateral meetings and four Glass Meetings. These meetings occurred in  
 8 Taiwan, Thailand, and Indonesia. Among the executives who attended these meetings on behalf of  
 9 the Toshiba corporate family were Masaru Ohmori and Seiichi (or Shigishi) Fukunaga.

10 **Samtel** participated in two illegal bilateral meetings between 1998 and 2006 in which  
 11 unlawful agreements as to, *inter alia*, price, output restrictions, and customer and market  
 12 allocation of CPT Products occurred. These meetings occurred in Malaysia. Sunil Kakria was  
 13 involved in these meetings on behalf of Samtel.

14 Chunghwa routinely prepared internal reports of the various bilateral and Glass Meetings.  
 15 After any meeting with customers, competitors, or others outside the company, a junior level  
 16 employee attending the meeting was responsible for preparing a written report. The resultant  
 17 document was circulated up the intracorporate chain of authority – first to a direct supervisor, and  
 18 stopping at a senior sales manager, vice-president, or the president/CEO level. At each level of  
 19 the chain of distribution, the reviewer initialed the report. A reviewer also often wrote comments  
 20 or directions for subordinates on the face of the report, and those subordinates would receive those  
 21 communications as the report circulated back down the chain of authority. These reports were later  
 22 produced by Chunghwa as part of its 2010 document production.

23 Based on these reports, Chunghwa gave DPPs' counsel a summary of the various  
 24 conspiratorial meetings that occurred for which a report had been prepared. The following grid  
 25 represents relevant portions of that summary, listing the type of meeting, the date and place of  
 26 each meeting, and the corporate (and sometimes individual) participants.

27

28

	<b>Date</b>	<b>Location</b>	<b>Meeting Type</b>	<b>Business Participants (Defendants)</b>
1	March 22, 1995	Malaysia	Bilateral	Samsung; CGW
2	May 29, 1995	Malaysia	Bilateral	Lucky Goldstar Electronics, which is now LG; CGW
3	June 29, 1995	Malaysia	Bilateral	Samsung; CGW
4	July 17, 1995	Unknown	Bilateral	Samsung; CGW
5	Aug. 16, 1995	Malaysia	Bilateral	Samsung; CGW
6	Aug. 23, 1995	Taiwan, Taipei	Bilateral Sa	Samsung; CGW
7	Sept 7, 1995	Taiwan, Taipei	Bilateral Toshiba;	CGW
8	Sept. 18, 1995	Unknown	Bilateral	Samsung; CGW
9	Sept. 19, 1995	Malaysia	Bilateral	Samsung (M); CGW
10	Sept. 22, 1995	Unknown	Bilateral	Toshiba; CGW
11	Oct. 5, 1995	Taiwan	Glass	Samsung; Goldstar (now LG); CGW
12	Nov. 14, 1995	Unknown	Bilateral	Sony; CGW
13	Dec. 4, 1995	Taiwan	Bilateral Mitsubishi	Electric; CGW
14	Dec. 5, 1995	Unknown	Bilateral	LG; CGW
15	Dec. 6, 1995	Malaysia	Bilateral	Samsung; CGW
16	Dec. 15, 1995	Taiwan	Bilateral	Sony Xinji Electronics; CGW
17	Feb. 2, 1996	Malaysia	Bilateral	Samsung; CGW
18	Feb. 9, 1996	Thailand	Bilateral	Toshiba; CGW
19	March 4, 1996	Unknown	Bilateral Daewoo;	CGW
20	March 17-18, 1996	Korea	Unknown	Samsung; LG; Orion; Philips; CGW
21	March 19, 1996	Malaysia	Bilateral	Samsung; CGW
22	April 15, 1996	Taiwan	Bilateral	Samsung; CGW
23	April 18, 1996	Taiwan, Taipei	Bilateral Sa	Samsung; CGW
24	April 18, 1996	Taiwan, Taipei	Bilateral Sony;	CGW
25	April 23, 1996	Malaysia	Bilateral Matsushita;	CGW
26	April 29, 1996	Unknown	Bilateral	Toshiba; CGW
27				
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1	May 6, 1996	Taiwan	Bilateral	MEC; CGW
2	May 7, 1996	By Telephone	Unknown	Samsung, LG; CGW
3	May 17, 1996	Malaysia	Bilateral	Samsung; CGW
4	May 17, 1996	Unknown	Bilateral	Orion; CGW
5	May 24, 1996	Malaysia	Bilateral	Orion; CGW
6	June 10, 1996	Malaysia	Bilateral	Samsung; CGW
7	June 10, 1996	Unknown	Bilateral	Samsung; CGW
8	June 12, 1996	Unknown	Bilateral	Mitsubishi; CGW
9	June 12, 1996	Malaysia	Bilateral	LG; CGW
10	June 17, 1996	Unknown	Bilateral	Toshiba; CGW
11	July 17, 1996	Taiwan	Bilateral	Matsushita; CGW
12	July 19, 1996	Unknown	Bilateral	Toshiba; CGW
13	Aug. 21, 1996	Unknown	Bilateral	Samsung; CGW
14	Sept. 4, 1996	Unknown	Bilateral	Toshiba; CGW
15	Sept. 11, 1996	Malaysia	Bilateral	Samsung; CGW
16	Sept. 23, 1996	Taiwan Taipei	Bilateral	Hitachi; CGW
17	Oct. 2, 1996	Taiwan Taipei	Bilateral	Samsung; CGW
18	Oct. 3, 1996	Taiwan	Bilateral	Toshiba; CGW
19	Oct. 4, 1996	Unknown	Unknown	Philips; CGW
20	Oct. 9, 1996	Taiwan, Taipei	Bilateral	Toshiba; CGW
21	Oct. 21, 1996	Malaysia	Bilateral	Samsung; CGW
22	Oct. 22, 1996	Taiwan	Bilateral	Philips; CGW
23	Oct. 22, 1996	Scotland	Bilateral	Samsung; CGW
24	Oct. 24, 1996	Unknown	Bilateral	LG; CGW
25	Oct. 30, 1996	Taiwan	Bilateral	Matsushita; CGW
26	Nov. 14, 1996	Taiwan	Bilateral	Samsung ; CGW
27	Nov. 21, 1996	Taiwan	Bilateral	Hitachi; CGW
28				

1	Nov. 21, 1996	Unknown	Bilateral	Mitsubishi Electric; CGW
2	Nov. 23, 1996	Unknown	Top Level	<u>Samsung</u> : CEO Sun  <u>Orion</u> : CEO Yan  <u>CGW</u> : Chieng – Yuan (“C.Y.”) Lin; Chih – Chun (“C.C.”) Liu; Jing – Song (“Jason”) Lu; President Fang
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4				
5				
6	Nov. 25, 1996	Unknown	Management	Hitachi; Samsung; CGW
7	Nov. 26, 1996	Unknown	Bilateral	Samsung; CGW
8	Nov. 27, 1996	By telephone	Bilateral	Samsung; CGW
9	Dec. 2, 1996	Malaysia	Bilateral	Samsung; CGW
10	Dec. 18, 1996	Unknown	Bilateral	Samsung; CGW
11	Jan. 8, 1997	Taiwan	Bilateral	Samsung; CGW
12	Jan. 9, 1997	Taiwan	Bilateral	Matsushita; CGW
13	Jan. 10, 1997	Taiwan	Bilateral	Hitachi; CGW
14	Jan. 10, 1997	Taiwan	Bilateral	Toshiba; CGW
15	Jan. 15, 1997	Taiwan Taipei	Bilateral LG; CGW	
16	Jan. 28, 1997	Unknown	Top Level	<u>Samsung</u> : Mr. Na; Mr. Ha; Mr. Lee  <u>Philips</u> : President Yu  <u>Orion</u> : Mr. Moon; Mr. Hee Kil Moon  <u>CGW</u> : C.Y. Lin; C.C. Liu; Wen – Chun (Tony) Cheng; Ching-Yuan (Michael) Du
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24	Feb. 24, 1997	Taiwan	Bilateral	Samsung; CGW
25	Feb. 24, 1997	Taiwan Taipei	Bilateral	LG, maybe Samsung; CGW
26	Feb. 25, 1997	Unknown	Top Level	<u>Samsung</u> Ming-Pei Song; Mr. Yoon; Mr. Na
27				
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1			<u>LG</u> Taipei President Lin <u>Philips</u> Market Sales Senior Manager Tseng;
2			<u>CGW</u> C.Y. Lin. C.C. Liu, Tony Cheng, Michael Du, Plant Manager Chen
3			
4	Feb. 27, 1997	Unknown	Bilateral Toshiba; CGW
5	Feb. 27, 1997	Unknown	Bilateral Daewoo; CGW
6	March 4, 1997	Taiwan	Bilateral Matsushita: CGW
7	March 12, 1997	Unknown	Working Level Samsung, Hitachi, LG, Orion, MEC, Philips; CGW
8	March 12, 1997	Unknown	Unknown Samsung, LG, Toshiba, Daewoo, and Thai CRT; CGW
9	March 12, 1997	Unknown	Glass Samsung, LG, Daewoo, Philips, Hitachi, and Matsushita: CGW
10	March 19, 1997	Unknown	Working Samsung, Philips, Orion, LG: CGW
11	March 26, 1997	Unknown	Glass Samsung, Philips; CGW
12	April 7, 1997	Taiwan Taipei	Bilateral Toshiba: CGW
13	April 8, 1997	Unknown	Bilateral Samsung; CGW
14	April 9, 1997	Taiwan	Bilateral Matsushita Electronics; CGW
15	April 23, 1997	Unknown	Glass Samsung, Philips, Orion; CGW
16	April 23, 1997	Unknown	Bilateral Matsushita; CGW
17	April 29, 1997	Taiwan	Bilateral Hitachi; CGW
18	May 2, 1997	Unknown	Bilateral Samsung; CGW
19	May 9, 1997	Unknown	Working Level Samsung, LG, Orion, and Philips; CGW
20	May 16, 1997	Unknown	Glass Samsung, LG; CGW
21	May 20, 1997	Taiwan	Glass Samsung, Philips, LG; CGW
22	May 20, 1997	Malaysia	Bilateral Samsung: CGW
23	May 20, 1997	Unknown	Bilateral Orion;
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1	May 23, 1997	Malaysia	Bilateral Matsushita; CGW
2	May 27, 1997	Taiwan Taipei	Bilateral Toshiba; CGW
3	June 4, 1997	Unknown	Bilateral Samsung; CGW
4	June 5, 1997	Unknown	Bilateral Samsung; CGW
5	June 9, 1997	Korea	Top Level Orion (Director Wen), Samsung (Director Luo); CGW (C.Y. Lin, C.C. Liu)
6	June 16, 1997	Taiwan	Bilateral Orion (Taipei); CGW
7	July 2, 1997	Unknown	Bilateral Samsung; CGW
8	July 4, 1997	Unknown	Bilateral Toshiba; CGW
9	July 8, 1997	Unknown	Bilateral Samsung; CGW
10	July 9, 1997	Taiwan Taipei	Bilateral Matsushita Electric Co.; CGW
11	July 16, 1997	Unknown	Bilateral Toshiba; CGW
12	July 18, 1997	Unknown	Bilateral Samsung; CGW
13	Aug. 1, 1997	Unknown	Bilateral Samsung; CGW
14	Aug. 18, 1997	Unknown	Bilateral Samsung; CGW
15	Aug. 29, 1997	Unknown	Bilateral Toshiba; CGW
16	Sept. 8, 1997	By telephone	Bilateral Samsung; CGW
17	Sept. 9, 1997	Malaysia	Bilateral Samsung; CGW
18	Sept. 12, 1997	Bilateral	Taiwan Matsushita; CGW
19	Sept. 22, 1997	Singapore	Bilateral LG; CGW
20	Sept. 29, 1997	Unknown Bilateral	Toshiba; CGW
21	Oct. 6, 1997	Taiwan	Bilateral Toshiba; CGW
22	Oct. 9, 1997	Taiwan	Glass Samsung, Philips; CGW
23	Oct. 13, 1997	Unknown	Bilateral MEC; CGW
24	Oct. 15, 1997	Malaysia	Bilateral MEC; CGW
25	Oct. 20, 1997	Unknown	Bilateral Samsung; CGW
26	Oct. 30, 1997	Taiwan	Glass Samsung, Philips; CGW
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1	Nov. 4, 1997	Malaysia	Bilateral	Samsung; CGW
2	Nov. 6, 1997	By telephone	Bilateral	Orion; CGW
3	Nov. 7, 1997	Taiwan Taipei	Bilateral Matsushita;	CGW
4	Nov. 11, 1997	Unknown	Bilateral	Samsung; CGW
5	Nov. 21, 1997	Taiwan	Glass	Samsung, Philips, LG; CGW
6	Nov. 24, 1997	Unknown	Bilateral	Thai – CRT; CGW
7	Dec. 8, 1997	Malaysia	Bilateral	Samsung; CGW
8	Dec. 9, 1997	Taiwan	Glass	Samsung, Orion; CGW
9	Dec. 24, 1997	Taiwan	Bilateral Matsushita;	CGW
10	Jan. 5, 1998	Unknown	Bilateral	Samsung; CGW
11	Jan. 14, 1998	Taiwan	Bilateral	Samsung; CGW
12	Jan. 14, 1998	Unknown	Bilateral	Toshiba; CGW
13	Jan. 16, 1998	Taiwan Taipei	Bilateral Matsushita;	CGW
14	Jan. 19, 1998	Unknown	Bilateral	Samsung; CGW
15	Jan. 19, 1998	Unknown	Bilateral	Matsushita; CGW
16	Jan. 20, 1998	Taiwan	Bilateral	Toshiba; CGW
17	Feb. 11, 1998	Taiwan, Taipei	Bilateral Matsushita;	CGW
18	Feb. 12, 1998	Unknown	Bilateral	Samsung; CGW
19	Feb. 18, 1998	Taiwan, Taipei	Bilateral LG;	CGW
20	Feb. 19, 1998	Taiwan	Bilateral	Samsung; CGW
21	Feb. 20, 1998	Taiwan	Bilateral	Orion; CGW
22	Feb. 24, 1998	Taiwan	Bilateral	Samsung; CGW
23	March 4, 1998	Unknown	Glass	Samsung, Philips, Orion; CGW
24	March 4, 1998	Unknown	Bilateral	LG; CGW
25	March 11, 1998	Taiwan	Bilateral	Toshiba; CGW
26	March 20, 1998	Taiwan Taipei	Bilateral Matsushita;	CGW
27	March 25, 1998	Taiwan	Bilateral	Samsung
28	March 30, 1998	Taiwan	Glass	Samsung, LG, Orion;

1	Taipei CGW		
2	April 1998 (no date available)	China Bilateral	Nanjing Huafei (part of LPD group); CGW
3	April 9, 1998	Taiwan	Bilateral
4			Samsung; CGW
5	April 14, 1998	Unknown	Bilateral
6			Samsung; CGW
7	April 14, 1998	Taiwan	Bilateral
8			Toshiba; CGW
9	April 15, 1998	Taiwan	Bilateral
10			Samsung; CGW
11	April 15, 1998	Taiwan	Bilateral Matsushita; CGW
12			
13	April 21, 1998	Taiwan, Taipei	Bilateral LG; CGW
14			
15	April 23, 1998	Unknown	Bilateral
16			Sony; CGW
17	April 24, 1998	Malaysia	Bilateral
18			Samsung; CGW
19	April 28, 1998	Taiwan	Bilateral
20			Samsung; CGW
21	May 5, 1998	Malaysia	Glass
22			Samsung, and LG; CGW
23	Mary 13, 1998	Unknown	Bilateral
24			LG; CGW
25	May 18, 1998	Unknown	Bilateral
26			Orion; CGW
27	May 18, 1998	Unknown	Bilateral
28			Toshiba; CGW
	May 27, 1998	Taiwan Taipei	Bilateral
			Matsushita; CGW
	June 1, 1998	Korea	GLASS
			Samsung; Orion; CGW
	June 10, 1998	Taiwan Taipei	Bilateral
			Samsung; CGW
	June 29, 1998	Unknown	Bilateral
			Orion; CGW
	July 3, 1998	Taiwan	Bilateral
			Toshiba CGW
	July 3, 1998	Taiwan	Bilateral
			Matsushita; CGW
	July 8, 1998	Malaysia	Bilateral
			LG; CGW
	July 9, 1998	Unknown	Bilateral
			LG; CGW
	July 14, 1998	Malaysia	Bilateral
			Samsung; CGW
	July 28, 1998	Malaysia	Bilateral
			Samsung; CGW
	Aug. 5, 1998	China	China meeting
			Samsung; Philips; BMCC; Irico; CGW
	Aug. 20, 1998	Unknown	Bilateral
			Toshiba; CGW
	Aug. 21, 1998	Unknown	Bilateral
			Hitachi;

1	CGW			
2	Aug. 25, 1998	Malaysia Working-level		Samsung, LG; CGW
3	Aug. 25, 1998	Taiwan Taipei	Bilateral	Matsushita; CGW
4	Sept. 4, 1998	China (Nanjing)	China meeting	Philips; Samsung; Irico; BMCC; Orion; LG; CGW
5	Sept. 7, 1998	Unknown	Glass	Samsung, LG, Orion; Thai CRT; CGW
6	Sept. 15, 1998	Unknown Bilateral		Panasonic; CGW
7	Sept. 26, 1998	Unknown	Glass	Samsung; LG; Orion; Thai CRT; CGW
8	Sept. 26, 1998	Unknown Bilateral		Matsushita; CGW
9	Oct. 9, 1998	China (Fuzhou)	China meeting	Samsung; Philips; Orion; LG; Irico; CGW
10	Oct. 14, 1998	Unknown Bilateral	meeting	Samsung; CGW
11	Oct. 15, 1998	Taiwan Bilate	ral meeting	Toshiba; CGW
12	Oct. 15, 1998	Taiwan Bilate	ral meeting	Matsushita; CGW
13	Oct. 28, 1998	Unknown Europe	Glass meeting	LG; Orion; Samsung; Philips; CGW
14	Nov. 6, 1998	China (Xi'an)	China meeting	Philips; Samsung; Orion; Irico; BMCC; CGW
15	Nov. 20, 1998	Unknown Bilateral	ral meeting	Hitachi; CGW
16	Nov. 27, 1998	Unknown	Glass meeting	Samsung; LG; Orion; Thai CRT; CGW
17	Dec. 8-10, 1998	China (Beijing)	China meeting	Philips; Samsung; LG; Orion; Irico; BMCC; CGW
18	Dec. 11, 1998	Unknown Bilateral	ral meeting	Matsushita; CGW
19	Dec. 16, 1998	Taiwan Bilate	ral meeting	Toshiba; CGW
20	Dec. 17, 1998	Unknown Bilateral	ral meeting	LG; CGW
21	Dec. 18, 1998	Unknown Bilateral	ral meeting	Mitsubishi; CGW
22	Dec. 28, 1998	China (Xiamen)	China meeting	Philips; Samsung; Orion; Irico; CGW
23	Jan. 8, 1999	China (Xiamen)	China meeting	Samsung; Huafei; Orion; Irico; Philips; CGW
24	Jan. 13, 1999	Unknown	Glass meeting	Samsung; Philips; Orion; LG; CGW
25	Jan. 18, 1999	Taiwan Top-leve	1 meeting	Samsung: Mr. Inn Kim, Mr. D.Y. Kim, Mr. Na, Mr. Ha, Mr. J.I. Lee
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1			<u>LG</u> : S.Y. Choi, C.S. Jeon, Mr. K.Y. Ko, J.M. Park
2			<u>Orion</u> : H.C. Moon, K.H. Kang, J.H. Moon
3			<u>Philips</u> : David Chang, Jerry Lin, Mr. Rosa Hu
4			<u>CGW</u> : C.Y. Lin, C.C. Liu, Tony Cheng, Sheng – Jen (S.J.) Yang, Michael Du, Chun-Mei (Christina) Hsieh
5	Jan. 22, 1999	Unknown	Bilateral meeting
6	Jan. 30, 1999	Unknown	Bilateral meeting
7	Feb. 2, 1999	China (Shenzhen)	China meeting
8	Feb. 10, 1999	Unknown	Glass meeting
9	Feb. 16, 1999	Unknown	Glass meeting
10	Feb. 23, 1999	Taiwan	Bilateral meeting
11	March 1, 1999	Unknown	Working-level meeting
12	March 5, 1999	Malaysia	Glass meeting
13	March 6, 1999	Malaysia	Green meeting
14	March 7, 1999	Malaysia	Glass meeting
15	March 11, 1999	Telephonic	Bilateral meeting
16	March 15, 1999	Unknown	Working-level meeting
17	March 24, 1999	Taiwan Taipei	Bilateral meeting
18	April 2, 1999	China (Nanjing)	China meeting
19	April 9, 1999	Indonesia	Glass meeting
20	April 14, 1999	Unknown	Top-level meeting
21			<u>Samsung</u> : In Kim, D.Y. Kim, Mr. Lee Jae In
22			<u>LG</u> : Mr. K.S. Cho, Mr. C.S. Jeon, Mr. K.Y. Ko
23			<u>Orion</u> : Mr. H.C. Moon, Mr. K.H. Kang, Mr. S. Y. Byun, Mr. Jimmy
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1			Kim <u>Philips</u> : Mr. David Chang, Mr. Jerry Lin <u>CGW</u> : C.Y. Lin, C.C. Liu, Michael Du
2	April 15, 1999	Korea Management meeting	Samsung; Orion; LG; CGW
3	April 28, 1999	Unknown	Glass meeting
4	May 6, 1999	China (Xi'an)	Samsung; Orion; Philips; CGW
5	May 6, 1999	Unknown	Bilateral meeting
6	May 7, 1999	China (Xi'an Xianying)	Toshiba; CGW
7	May 10, 1999	Korea Seoul	Philips; Samsung; Orion; Irico; CGW
8	May 12, 1999	Unknown	Bilateral meeting
9	May 12, 1999	Working-level meeting	Irico; CGW
10	May 12, 1999	Unknown	Glass meeting
11	May 12, 1999	Working-level meeting	Samsung; LG; Orion; Thai CRT; CGW
12	May 20, 1999	Unknown	Working-level meeting
13	May 20, 1999	Top-level meeting	Samsung: Mr. Inn Kim, Michael Son, Mr. Ha  Orion: Mr. H.C. Moon, Mr. J.W. Moon, Mr. Karl Min, Mr. J.H. Moon  LG: Mr. S.Y. Choi, Mr. G.I. Choi, Mr. S.H. Jo, Mr. S.M. Ahn  CGW: C.Y. Lin, C.C. Liu, Michael Du, Christina Hsieh
14	May 21, 1999	China	Management meeting
15	May 24, 1999	Telephonic	Bilateral meeting
16	June 1, 1999	Taiwan Management	Management meeting
17	June 4, 1999	China (Shenzhen)	China meeting
18	June 21, 1999	Unknown	Glass meeting
19	June 21, 1999	Unknown	Glass
20	June 22, 1999	Unknown	Glass
21	June 23, 1999	Korea	Top
22			<u>Samsung</u> (Mr. Inn Kim, D.Y. Kim, Mr. J.I. Lee, Mr. Ha)  <u>Philips</u> (David Chang, Jerry Lin, Ms. )
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1			Rosa Hsu)  <u>Orion</u> (Mr. H.C. Moon, Mr. K.H. Kang, Mr. J.H. Moon, Mr. Jimmy Kim), and LG (Mr. K.S. Cho, Mr. C.S. Jeon, Mr. J.M. Park, Mr. K.Y. Ko);  <u>CGW</u> (C.Y. Lin, Tony Cheng, Michael Du, Christina Hsieh)
2	June 28, 1999	Unknown	Bilateral  Matsushita;  <u>CGW</u>
3	July 6, 1999	Taiwan Taipei	Bilateral LG;  <u>CGW</u>
4	July 7, 1999	Unknown	Bilateral  <u>Samsung</u> ;  <u>CGW</u>
5	July 9, 1999	China (Fuzhou)	China  <u>Orion</u> , <u>Philips</u> , and <u>Irico</u> ;  <u>CGW</u>
6	July 13, 1999	China (Tianjin)	Bilateral Sa  <u>msung</u> ;  <u>CGW</u>
7	July 20, 1999	Unknown	Bilateral Matsus hita
8	July 23, 1999	Taiwan	Top Level  <u>Samsung</u> (Mr. In Kim, Mr. D.Y. Kim, Mr. Lee Jae In, Mr. Ha)  <u>LG</u> (Mr. S.Y. Choi, Mr. C.S. Jeon, Mr. Johnny Song, Mr. K.Y. Ko)  <u>Orion</u> (Mr. H.C. Moon, Mr. J.H. Moon, Mr. K.H. Kang, Mr. D.W. Yoon)  <u>Philips</u> (Mr. David Chang, Mr. Jerry Lin, Mr. Rosa Hu)  <u>CGW</u> (C.Y. Lin, C.C. Liu, Tony Cheng, Michael Du)
9	July 28, 1999	Unknown	Glass  <u>Samsung</u> , <u>LG</u> , <u>Orion</u> , and <u>Philips</u> ;  <u>CGW</u>
10	July 28, 1999	Taiwan Taipei	Bilateral Toshiba;  <u>CGW</u>
11	July 29, 1999	Malaysia	Bilateral Matsus hita
12	Aug. 4, 1999	Unknown	Working  <u>Samsung</u> , <u>Philips</u> , <u>Orion</u> , and <u>LG</u> ;  <u>CGW</u>
13	Aug. 4, 1999	Malaysia	Bilateral  <u>Samsung</u> ;  <u>CGW</u>
14	Aug. 5, 1999	Unknown	Glass  <u>Irico</u> and <u>Orion</u> ;  <u>CGW</u>
15	Aug. 5, 1999	China (Nanjing)	China meetings  <u>Samsung</u> , <u>BMCC</u> , <u>Orion</u> , <u>Irico</u> , <u>Philips</u> ;  <u>CGW</u>
16	Aug. 5, 1999	China	China  <u>Samsung</u> , <u>BMCC</u> , <u>Huafei</u> , and <u>Irico</u> ;  <u>CGW</u>
17	Aug. 10, 1999	Unknown	Glass  <u>Samsung</u> , <u>LG</u> , <u>Orion</u> , and <u>Philips</u> ;  <u>CGW</u>
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1	Aug. 20, 1999	Korea	Green	Unknown; CGW
2	Aug. 20, 1999	Korea	Top	<u>Samsung</u> (Mr. In Kim, Mr. D.Y. Kim, Mr. Ha, Mr. Lee Jae In), LG (S.Y. Cho, Mr. C.S. Jeon, Mr. K.Y. Ko)  <u>Orion</u> (Mr. H.C. Moon, Mr. Han-Koo Cho, Mr. K.H. Kang, Mr. Kim)  <u>Philips</u> (Mr. David Chang, Mr. J.M. Smith, Mr. Jerry Lin, Mr. J.H. Pei); <u>CGW</u> (C.Y. Lin, C.C. Liu, Michael Du)
3	Aug. 22, 1999	Korea	Audits	LG, Samsung, Orion; CGW
4	Aug. 23, 1999	Unknown	Glass	Samsung, LG, Orion, and Thai CRT; CGW
5	Sept. 1, 1999	China (Shenzhen)	Bilateral Sa	msung; CGW
6	Sept. 2, 1999	China (Xian)	China	Samsung, Irico, Orion, and Philips; CGW
7	Sept. 2, 1999	Taiwan	Mangmt Level	Samsung, Philips, Orion, and LG; CGW
8	Sept. 7, 1999	Malaysia	Bilateral Matsus	hita; CGW
9	Sept. 13, 1999	Malaysia	Management Level	Samsung, LG, Orion, Thai CRT; CGW
10	Sept. 14, 1999	Malaysia	Bilateral Matsus	hita; CGW
11	Sept. 15, 1999	Taiwan	Bilateral Matsus	hita Taiwan; CGW
12	Sept. 15, 1999	Taiwan	Bilateral	Toshiba; CGW
13	Sept. 20, 1999	Taiwan (Taoyuan)	Top Level	<u>Samsung</u> : Mr. In Kim, Mr. D.Y. Kim, Mr. Lee Jae In, Mr. Ha  <u>LG</u> : Mr. S.Y. Choi, Mr. C.S. Jeon, Mr. Lim, Mr. K.Y. Ko  <u>Orion</u> : Mr. Han – Koo Cho, Mr. Jimmy Kim, Mr. K.H. Kang, Mr. Moon  <u>Philips</u> : Mr. Jim Smith, Mr. Jerry Lin, Ms. Rosa Hu  <u>CGW</u> : C.Y. Lin, C.C. Liu, Tony Cheng, S.J. Yang, Michael Du
14	Sept. 21, 1999	Taiwan (Taoyuan)	Management	Samsung, LG, Orion, Philips; CGW
15	Sept. 28, 1999	Unknown	Glass	Samsung, Philips, Orion, LG; CGW
16	Sept. 29, 1999	Unknown	Bilateral	Toshiba; CGW
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1	Oct. 1, 1999	Malaysia	Bilateral Matsushita; CGW
2	Oct. 2, 1999	Unknown	Glass Daewoo, Philips; CGW
3	Oct. 4, 1999	Taiwan, Taipei	Bilateral Samsung; CGW
4	Oct. 5, 1999	Taiwan, Taipei	Bilateral LG; CGW
5	Oct. 6, 1999	China	Bilateral Samsung; CGW
6	Oct. 11, 1999	Unknown	Europe Glass Irico, Philips; CGW
7	Oct. 12, 1999	China (Tianjin)	China Irico, Samsung, BMCC, and Philips; CGW
8	Oct. 13, 1999	Taiwan	Top Level <u>Samsung</u> : Mr. Lee <u>Philips</u> : Mr. Jerry Lin, Ms. Limay Liu <u>Orion</u> : Mr. Moon <u>LG</u> : Mr. Lin, Mr. Charles Lu <u>CGW</u> : C.Y. Lin, C.C. Liu, Michael Du, Christina Hsieh
9	Oct. 20, 1999	Taiwan	Glass Samsung, Philips, LG; CGW
10	Oct. 20, 1999	Unknown	Bilateral Toshiba; CGW
11	Oct. 20, 1999	Taiwan	Bilateral Sony; CGW
12	Oct. 20, 1999	Scotland, Glasgow	Europe glass Philips, Daewoo; CGW
13	Oct. 27, 1999	Thailand	Glass Meeting Samsung, Orion, and Thai CRT; CGW
14	Nov. 3, 1999	Unknown	Glass Samsung, LG, and Philips; CGW
15	Nov. 5, 1999	China	China Philips, Samsung, Orion; CGW
16	Nov. 5, 1999	Taiwan	Bilateral Toshiba; CGW
17	Nov. 9, 1999	Korea, Seoul	Glass Samsung, LG, and Orion; CGW
18	Nov. 9, 1999	Unknown	Glass Samsung, LG, and Philips; CGW
19	Nov. 10, 1999	Taiwan	Bilateral Matsushita; CGW
20	Nov. 11, 1999	Unknown	Europe Glass Philips, Orion, Samsung, and LG; CGW
21	Nov. 12, 1999	Europe	Bilateral Philips; CGW
22	Nov. 16, 1999	Unknown	Working Samsung, LG, Orion, Philips; CGW
23	Nov. 25, 1999	Taiwan (Taoyuan)	Management Level Samsung, Philips, Orion, Thai CRT; CGW
24	Nov. 26, 1999	Taiwan	Glass LG, Orion, Samsung, Philips;

1	Nov. 26, 1999	(Taoyuan) CGW Taiwan (Taoyuan)	Green	LG, Orion, Samsung, Philips; CGW
2	Nov. 30, 1999	Unknown	Glass	Samsung, LG, Philips, and Orion; CGW
3	Dec. 9, 1999	China (Suzhou)	China	Irico, BMCC, Samsung, and Philips; CGW
4	Dec 13, 1999	Unknown	Bilateral Matsushita;	
5	Dec. 15, 1999	Unknown	Europe Glass	Philips and Irico; CGW
6	Dec. 22, 1999	Unknown	Working level	Samsung, Philips, Orion, LG; CGW
7	Dec. 31, 1999	Unknown	Bilateral	Toshiba; CGW
8	Jan. 12, 2000	Unknown	Glass	Samsung, LG, Philips, Orion; CGW
9	Jan. 13, 2000	China (Xian)	China	Samsung, Irico, Philips; CGW
10	Jan. 18, 2000	Unknown	Glass	Samsung, LG, Orion, Thai CRT; CGW
11	Jan. 24, 2000	Unknown	Top	<u>Samsung</u> : Mr. In Kim, Mr. D.Y. Kim, Mr. Ha, Mr. Lee Jae In  <u>LG</u> : Mr. S.Y. Choi, Mr. S.K. Lee, Mr. K. Y. Ko, Mr. Lim  <u>OEC (Orion)</u> : Mr. Han-Koo Cho, Mr. H.S. Lee, Mr. J.H. Moon, Mr. S.G. Oh  <u>Philips</u> : Mr. Jim Smith, Mr. Jerry Lin, Ms. Limay Liu  <u>CGW</u> : C.Y. Lin, C.C. Liu, Tony Cheng, Michael Du
12	Jan. 24, 2000	Unknown	Management	Samsung, LG, Orion, Thai CRT, Philips; CGW
13	Jan. 25-28, 2000	Unknown Green		Unknown; CGW
14	Feb. 22, 2000	Taiwan	Bilateral	Hitachi; CGW
15	Feb. 24, 2000	Korea	Glass	Samsung, LG, Orion, and Philips; CGW
16	March 2, 2000	Tiawan	Bilateral	Toshiba; CGW
17	March 3, 2000	Taiwan	Bilateral	Samsung; CGW
18	March 6, 2000	China (Shenzen)	China	Samsung, Irico, Philips; CGW
19	March 6, 2000	Indonesia	Bilateral	Toshiba; CGW
20	March 7-8, 2000	Unknown	Green	Samsung, LG, Orion, Thai CRT and Philips;

1	March 10, 2000	Thailand	Bilateral	CGW
2	March 21, 2000	Taiwan	Bilateral	Toshiba; CGW
3	March 23, 2000	Taiwan	Bilateral Matsushita;	CGW
4	March 24, 2000	Korea Seoul	Glass	Samsung, LG, Orion, Thai CRT, Philips; CGW
5	March 25, 2000	Korea Seol	Green	LG, Orion, Philips, and Samsung; CGW
6	March 25, 2000	Korea, Seoul	Management	LG, Orion, Philips, and Samsung; CGW
7	April 6, 2000	China (Xiamen)	China	Samsung, Irico, BMCC, LG, Philips, Orion; CGW
8	April 9-10, 2000	Various Audit		Samsung; CGW
9	April 11, 2000	Taiwan, Taipei	Bilateral Hitachi;	CGW
10	April 11, 2000	Taiwan, Taipei	Bilateral Sony;	CGW
11	April 14, 2000	Korea, Seoul	Management	Samsung, LG, Orion, Philips; CGW
12	May 2, 2000	Unknown	Bilateral	MEC; CGW
13	May 4, 2000	Taiwan	Bilateral	Toshiba; CGW
14	May 9, 2000	China, Nanjing	China	Samsung, Irico, BMCC, LG, Philips, Orion; CGW
15	May 25, 2000	China Shanghai	Management	Samsung, LG, Orion, and Philips; CGW
16	May 26, 2000	Unknown	Glass	Samsung, LG, Orion, Philips; CGW
17	May 31, 2000	China	Bilateral	Haufei; CGW
18	June 6, 2000	China	Audit	Samsung; CGW
19	June 8, 2000	Taiwan, Taipei	Bilateral Matsushita;	CGW
20	June 9, 2000	China, Beijing	China	Irico, Samsung, BMCC, LG, Philips, Orion; CGW
21	June 9, 2000	Taiwan	Bilateral	Toshiba; CGW
22	June 16, 2000	Taiwan Taipei	Bilateral Hitachi;	CGW
23	June 20, 2000	Malaysia	Glass	Samsung, LG, Orion, Philips; CGW
24	June 20, 2000	Malaysia	Green	Samsung, Orion, LG, Philips; CGW
25	June 20, 2000	Unknown	Glass	Samsung, LG, Orion, Philips, Thai
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1			CRT; CGW	
2	June 21, 2000	Malaysia	Bilateral	Matsushita MMEC; CGW
3	June 23, 25 2000	Europe Unknown		Philips, Irico; CGW
4	June 28, 2000	Unknown	Working	Samsung, LG, Orion, Philips; CGW
5	July 4, 2000	Unknown	Bilateral	Philips; CGW
6	July 6, 2000	Taiwan Taipei	Bilateral	Toshiba; CGW
7	July 10, 2000	China (Xian)	China	Orion, Samsung, Philips, Irico, and LG; CGW
8	July 13, 2000	Korea Seoul	Glass	Samsung, LG, Orion, Philips; CGW
9	July 18, 2000	Taiwan	Bilateral	Hitachi; CGW
10	August 2, 2000	Taiwan	Bilateral	Toshiba; CGW
11	Aug. 11, 2000	China Tianjin	China	Irico, Samsung, BMCC, LG, Philips, and Orion; CGW
12	Aug. 22, 2000	Taiwan Taoyuan	Top Sa	<u>msung</u> : Mr. Inn Kim, Mr. S.K. Park, Mr. Michael Son, Mr. Ha  <u>LG</u> : Mr. S.Y. Choi, Mr. G.I. Choi, Mr. Johnny Son  <u>Orion</u> : Mr. H.K. Cho, Mr. Lee, Mr. Karl Min, Mr. Kang  <u>Philips</u> : Mr. Jim Smith, Mr. Jerry Lim, Ms. Rosa Hu  <u>CGW</u> : C.C. Liu, S.J. Yang, Michael Du
13	Sept. 13-20, 2000	United Kingdom (CPT UK) – Chunghwa's UK facility	Europe Glass	Philips, DOSA (Orion), Samsung; CGW
14	Sept. 14, 2000	China Changsha	China	Irico, Samsung, BMCC, LG, Philips, Orion; CGW
15	Sept. 21, 2000	Taiwan Taipei	Top Sa	<u>msung</u> : Mr. In Kim, Mr. D.Y. Kim, Mr. Lee Jae In, Mr. Ha  <u>LG</u> : S.Y. Choi, Mr. S.K. Lee, Mr. Lim, Mr. K.Y. Ko  <u>Orion</u> : Mr. Cho, Mr. J.H. Moon, Mr. Jimmy Kim, Mr. Kang
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1			<u>Philips</u> : Mr. Jerry Lin
2			<u>CGW</u> : C.C. Liu, Tony Cheng, S.J. Yang, Michael Du
3	Sept. 21, 2000	Taiwan, Taipei	<u>msung</u> : Mr. In Kim, Mr. D.E. Lee, Mr. S.K. Park, Mr. Michael Son <u>LG</u> : Mr. S.Y. Choi, Mr. K.J. Park, Mr. K.Y. Ko <u>Orion</u> : Mr. Cho, Mr. Lee, Mr. Karl Min, Mr. Kang <u>Philips</u> : Mr. Jim Smith, Mr. Jerry Lin, Ms. Rosa Hu <u>CGW</u> : C.C. Liu, Tony Cheng, S.J. Yang, Michael Du
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10	Sept. 27, 2000	Unknown	Working
11			Samsung, LG, Orion, Philips; CGW
12	Sept. 28, 2000	Taiwan Taipei	Bilateral Toshiba; CGW
13	Oct. 12, 2000	China Fuzhou	China
14			Irico, Samsung, LG, Orion, Philips; CGW
15	Oct. 25, 2000	Korea Seoul	Management
16			Samsung, LG, Orion, Philips, Thai CRT; CGW
17	Oct. 25, 2000	Korea Seoul	Management
18			Samsung, LG, Orion, Philips; CGW
19	Oct. 26, 2000	Korea Seoul	Green
20			Unknown; CGW
21	Nov. 3, 2000	Unknown	Bilateral
22			Hitachi; CGW
23	Nov. 9, 2000	China Nanjing	China
24			Irico, Samsung, LG, Orion, Philips, BMCC; CGW
25	Dec. 7, 2000	China Xian	China
26			Philips, Irico, Samsung, LG; CGW
27	Dec. 13, 2000	Unknown	Working
28			Samsung, Philips, LG, Orion; CGW
29	Jan. 12, 2001	Unknown	Bilateral
30			Toshiba; CGW
31	Jan. 31, 2001	Unknown	Europe Glass
32			Philips, Orion; CGW
33	Feb. 15, 2001	China	Bilateral
34			Irico; CGW
35	Feb. 22, 2001	China	Samsung, LG, Philips, BMCC, Irico; CGW
36			
37	March 5, 2001	Taiwan	Bilateral
38			Toshiba; CGW
39	March 19, 2001	Unknown	Glass
40			Samsung, LG, Orion, Philips; CGW
41	March 20, 2001	Unknown	Management
42			Samsung, LG, Orion, Philips;

1	March 28, 2001	Unknown	Glass	CGW
2	April 3, 2001	China Shenzhin	Audit Sa	samsung; CGW
3	April 11, 2001	China	Bilateral	Samsung; CGW
4	April 12, 2001	Taiwan	Glass	Samsung, Philips, LG, Orion; CGW
5	April 18-19, 2001	China Shanghai	Management	Samsung, LG, Orion, Philips, Thai CRT; CGW
6	April 18, 2001	China Shanghai	Management	Samsung, LG, Orion, Philips; CGW
7	April 20, 2001	China Shanghai	Green Unknown	samsung; CGW
8	April 20, 2001	Unknown	Bilateral	Toshiba; CGW
9	April 27, 20001	China	Bilateral	Samsung; CGW
10	May 17, 2001	China Fuzhou	China	Philips, Samsung, LG; CGW
11	May 21, 2001	China	Bilateral	Samsung; CGW
12	May 31, 2001	Unknown	Bilateral	Thomson; CGW
13	June 6, 2001	China	Bilateral	Matsushita; CGW
14	June 7, 2001	China	Bilateral	Samsung; CGW
15	June 12, 2001	China	Bilateral	BMCC; CGW
16	June 19, 2001	Malaysia	Bilateral	Samsung; CGW
17	June 26, 2001	Unknown	Glass	Samsung, LG, Orion; CGW
18	June 27, 2001	Unknown	Glass	Samsung, LG, Orion; CGW
19	July 1, 2001	Unknown	Unknown	Philips, LG, Samsung, Orion; CGW
20	July 17, 2001	Unknown	Working	Samsung, LPD; CGW
21	July 24, 2001	Taiwan Taipei	Glass	Samsung, LG, Orion; CGW
22	July 24, 2001	Taiwan Taipei	Glass	Samsung, LG, Orion, Thai CRT; CGW
23	July 26, 2001	China	China	Samsung, LG Philips; CGW
24	July 26, 2001	Taiwan	Bilateral	Toshiba; CGW
25	Aug. 2, 2001	Taiwan	Bilateral	Mitsubishi Electronics; CGW
26	Aug. 13, 2001	Unknown	Management	Samsung, LPD, Orion; CGW
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1	Aug. 21, 2001	Korea Seoul	Glass	Samsung, LG, Orion, Thai CRT; CGW
2	Spet. 26, 2001	China	China	Samsung, LG Philips; CGW
3	Sept. 28, 2001	Unknown	Green	Unknown; CGW
4	Oct. 23, 2001	Unknown	Top	<u>Samsung</u> : Director Kim In, Kim Doek-Yoen, Park Sang-Kyu  <u>LPD</u> : Director Joe, Lee Seung-Kyu  <u>CGW</u> : C.Y. Lin, Tony Cheng
5	Nov. 20, 2001	Unknown	Glass	Samsung, LPD, Orion; CGW
6	Nov. 23, 2001	China (Fuzhou)	China	Samsung, LG, and Philips; CGW
7	Dec. 17, 2001	Unknown	Management	Samsung, LPD, Orion; CGW
8	Dec. 21, 2001	Unknown	Glass	Samsung, LG, Orion; CGW
9	Dec. 28, 2001	Unknown	Top	<u>Samsung</u> : Mr. D.Y. Kim, Mr. Park  <u>LPD</u> : Mr. K.S. Cho, Mr. S.Y. Choi, Mr. S.K. Lee  <u>CGW</u> : C.Y. Lin, C.C. Liu, Ling-Yun (Edward) Cheng
10	Jan. 4, 2002	Unknown	Glass	Samsung, LPD, and OEC; CGW
11	Jan. 11, 2002	Taiwan	Glass	Samsung, Orion, and LPD: CGW
12	Jan.18, 2002	Unknown	Glass	Samsung, LPD, Orion; CGW
13	Jan. 18, 2002	Unknown	Glass	Samsung, LPD, Orion; CGW
14	Jan. 23, 2002	Taiwan	Glass	Samsung, Orion, LPD; CGW
15	Jan. 30, 2002	Taiwan	Bilateral	LPD; CGW
16	Feb. 22, 2002	Taiwan, Taoyuan	Glass	Samsung, LPD, and Orion; CGW
17	Feb. 22, 2002	Unknown	Working	Samsung, LPD, Orion; CGW
18	March 5, 2002	Unknown	Glass	Samsung, LPD; CGW
19	March 6, 2002	Scotland Glasgow	Europe glass	Unknown; CGW
20	March 20, 2002	Unknown	Glass	Samsung, Orion, LPD; CGW
21	March 20, 2002	Unknown	Glass	Samsung, LPD, Orion; CGW
22	April 22, 2002	Thailand	Glass	Samsung, Orion, LPD; CGW
23	May 28, 2002	Unknown	Glass	Samsung, LPD, Orion;
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			CGW	
1	June 21, 2002	Unknown	Glass	LPD and DOSA (Orion); CGW
2	Sept. 13, 2002	Unknown	Glass	Thai CRT, Toshiba, LPD, Samsung; CGW
3				
4	Oct. 17, 2002	Malaysia	Glass	Thai CRT, Toshiba, LPD, Samsung, Orion; CGW
5				
6	Dec. 12, 2002	Unknown	Glass	Samsung, LPD; CGW
7	Dec. 17, 2002	Singapore	Glass	Thai CRT, Toshiba, LPD, Samsung; CGW
8	Jan. 2003 (no exact date known)	Unknown	Glass	LPD, Samsung; CGW
9				
10	Jan. 1, 2003	Unknown	Working	Samsung, LPD; CGW
11	Feb. 2003 (approx.)	Unknown	Glass	LPD, Samsung; CGW
12	Feb. 14, 2003	China	Bilateral	Irico; CGW
13	Feb. 21, 2003	Singapore	Glass	Thai CRT, Toshiba , LPD ; CGW
14	Feb. 26-28, 2003	Unknown	Bilateral (meeting on each date)	Matsushita, Thai CRT, Toshiba CGW
15	March 20, 2003	Unknown	Glass	Unknown; CGW
16	March 21, 2003	Unknown	Unknown	Samsung, LPD; CGW
17	March 27, 2003	China (Shenzhen)	Marketing Sa	msung, LPD; CGW
18	April 22, 2003	Unknown	Glass	Unknown; CGW
19	April 22, 2003	Unknown	Glass	Unknown; CGW
20	April 29, 2003	China (Xiamen)	Unknown	Samsung , LPD; CGW
21	April 30, 2003	Unknown	Glass	Samsung, LPD; CGW
22	May 2003 (approx.)	Unknown	Glass	LPD, Samsung; CGW
23	May 8, 2003	By telephone	Bilateral	Samsung; CGW
24	May 22, 2003	Singapore	Glass	MTPD, Samsung, LPD, Thai CRT; CGW
25	May 30, 2003	Unknown	Unknown	Samsung, LPD; CGW
26	June 2003 (approx.)	Unknown	Glass	Samsung, LPD; CGW
27	June 2, 2003	Unknown	Glass	LPD, Samsung; CGW
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1	June 17, 2003	Malaysia	Top	<u>LPD</u> : C.S.O. Mr. Kim, Mr. Yang <u>Samsung</u> : E.V.P. Mr. Kim, Mr. Kim, CGW: Unknown
2	June 17, 2003	Malaysia	Green	LPD, Samsung; CGW
3	June 18, 2003	Malaysia	Green	Samsung, LPD; CGW
4	July 4, 2003	Unknown	Glass	Samsung, LPD; CGW
5	July 21, 2003	Unknown	Working	Samsung, LPD; CGW
6	July 29, 2003	Unknown	Glass	LPD, Samsung; CGW
7	Aug. 4, 2003	Unknown	Bilateral	Thai CRT; CGW
8	Aug. 20, 2003	China	Bilateral	Irico; CGW
9	Aug. 28, 2003	Unknown	Unknown	Samsung, LPD; CGW
10	Sept. 2003 (approx.)	Unknown	Glass	LPD, Samsung; CGW
11	Sept. 2003 (approx.)	Unknown	Glass	Samsung, LPD; CGW
12	Sept. 2003 (approx.)	Unknown	Glass	LPD, Samsung; CGW
13	Sept. 5, 2003	Unknown	Glass	MTPD, Samsung, LPD, Thai CRT; CGW
14	Sept. 24, 2003	Unknown	Working	Samsung, LPD; CGW
15	Oct. 28, 2003	Unknown	Management	Samsung, LPD; CGW
16	Oct. 28, 2003	Unknown	Green	Samsung, LPD; CGW
17	Oct. 29, 2003	Unknown	Glass	LPD, Samsung; CGW
18	Nov. 7, 2003	Malaysia	Glass	MTPD, Samsung, LPD, and Thai CRT; CGW
19	Nov. 12, 2003	Unknown	Glass	MTPD, Samsung, LPD, and Thai CRT; CGW
20	Nov. 12, 2003	Taiwan	Management	Samsung, LPD; CGW
21	Nov. 26, 2003	Korea	Top	Samsung, LPD; CGW
22	Nov. 26, 2003	Korea	Green	Samsung, LPD; CGW
23	Nov. 27, 2003	Korea, (Jesu Island)	Green LPD,	Samsung; CGW
24	Dec. 2, 2003	Unknown	Glass	Samsung, LPD;
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1			CGW
2	Dec. 18, 2003	Singapore	Bilateral
3	Dec. 23, 2003	China (Shenzhen)	Management Sa
4	Dec. 31, 2003	China (Shenzhen)	Bilateral Irico
5	Jan. 27, 2004	China (Xiaman)	Management LPD, Samsung;
6	Feb. 16-17, 2004	Unknown	CGW
7	March 1, 2004	Unknown	Glass
8	March 3, 2004	China (Shenzhen)	Bilateral Orion;
9	March 3, 2004	Unknown	Green
10	March 4, 2004	Taiwan, Taipei	Management LPD, Samsung;
11	March 16, 2004	Singapore	CGW
12	March 25-27, 2004	Korea Glass	Glass
13	April 23, 2004	Thailand	MTPD, Samsung, LPD, and Thai CRT;
14	April 26, 2004	China Shanghai	CGW
15	April 27, 2004	China Shanghai	msung, LPD;
16	May 10, 2004	Unknown	CGW
17	May 18, 2004	Malaysia	Samsung, LPD;
18	May 26, 2004	Unknown	CGW
19	June 2, 2004	Unknown	MTPD, Samsung, LPD, and Thai CRT;
20	June 18, 2004	Thailand	CGW
21	June 28, 2004	Unknown	Management
22	June 29, 2004	Unknown	LPD, Samsung;
23	June 30, 2004	Unknown	CGW
24	July 13, 2004 – approx	Unknown	LPD, Samsung;
25		Bilateral	CGW
26	July 22, 2004	Singapore	Thomson;
27	July 26, 2004	China Shanghai	CGW
28	July 26, 2004	China	LPD, Samsung;

1		Shanghai CGW	
2	July 27, 2004	China Shanghai	Green Sa msung, LPD; CGW
3	Aug. 17-18, 2004	Japan Glass	Samsung, LPD; CGW
4	Aug. 17, 2004	China Kunming	Top Sa msung, LPD; CGW
5	Aug. 18, 2004	China Kunming	Green Sa msung, LPD; CGW
6	Sept. 17, 2004	Taiwan	Glass MTPD, Samsung, LPD, and Thai CRT; CGW
7	Sept. 20, 2004	Korea	Management LPD, Samsung; CGW
8	Sept 20-21, 2004	Korea Green	
9			Unknown; CGW
10	Oct. 26, 2004	Unknown	Working Samsung, LG Philips (LPD); CGW
11	Nov. 2004 (approx.)	Unknown Glass	Samsung, LPD; CGW
12	Nov. 2, 2004	China	Bilateral Samsung; CGW
13	Nov. 5, 2004	Malaysia	Glass MTPD, Samsung, LPD, Thai CRT; CGW
14	Nov. 15, 2004	Unknown	Marketing LPD, Samsung; CGW
15	Nov. 24, 2004	Unknown	Unknown Samsung; CGW
16	Nov. 29, 2004	Korea	Glass Samsung, LPD; CGW
17	Dec. 1, 2004	China Shenzhen	Bilateral Irico ;
18	Dec. 28, 2004	Malaysia	Glass MTPD, Samsung, LPD, Thai CRT; CGW
19	Dec. 29, 2004	Unknown	Unknown Samsung, LPD; CGW
20	Jan. 19, 2005	Taiwan Taipei	Management Sa msung, LPD; CGW
21	Feb. 24, 2005	Taiwan	Management LPD, Samsung; CGW
22	Feb. 24, 2005	Malaysia	Green Unknown; CGW
23	Feb. 25, 2005	Malaysia	Glass MTPD, Samsung, LPD, and Thai CRT; CGW
24	March 29, 2005	Unknown	Management LPD, Samsung; CGW
25	March 30, 2005	Unknown	Green Unknown; CGW
26	April 11, 2005	China	Bilateral Kitamatsu; CGW
27	April 13, 2005	China	Unknown Samsung, LPD;
28			

1			CGW
2	April 20, 2005	China	Bilateral Irico; CGW
3	April 26, 2005	Korea Seoul	Glass Samsung, LPD; CGW
4	April 26, 2005	Unknown	Management LPD, Samsung; CGW
5	April 26, 2005	Korea	Green Unknown; CGW
6	April 29, 2005	Indonesia	Glass MTPD, Samsung, LPD, Thai CRT; CGW
7	May 19, 2005	Thailand	Bilateral Thai CRT; CGW
8	May 24, 2005	Taiwan Taipei	Management LPD, Samsung; CGW
9	May 24, 2005	Taiwan Taipei	Unknown Sa msung, LPD; CGW
10	June 9, 2005	Malaysia	Glass MTPD, Samsung, LPD, Thai CRT; CGW
11	June 28, 2005	Unknown	Management LPD, Samsung; CGW
12	Aug. 26, 2005	Taiwan (Linkou)	Bilateral Sa msung; CGW
13	Sept. 22, 2005	Indonesia, Jakarta	Glass MTPD, Samsung, LPD, Thai CRT; CGW
14	Sept. 28, 2005	Taiwan Taoyuan	Management Sa msung, LPD; CGW
15	Sept. 28, 2005	Taiwan Taoyuan	Green Samsung and LPD; CGW
16	Oct. 21, 2005	Taiwan	Glass MTPD, Samsung SDI, LPD and Thai CRT; CGW
17	Nov. 2, 2005	Taiwan	Glass Samsung, LPD; CGW
18	Nov. 18, 2005	China	Bilateral Samsung; CGW
19	Nov. 21, 2005	Unknown	Glass Samsung, LPD; CGW
20	Dec. 6, 2005	Malaysia	Glass MTPD, Samsung, LPD, and Thai CRT; CGW
21	Dec. 20, 2005	Taiwan (Taoyuan)	Management LPD, Samsung; CGW
22	Dec. 21, 2005	Taiwan (Taoyuan)	Green Samsung, LPD; CGW
23	Feb. 10, 2006	Thailand	Bilateral Thai CRT; CGW
24	March 09, 2006	Unknown	Glass MTPD, Samsung, LPD, and Thai CRT; CGW
25	March 14, 2006	Korea Seoul	Glass Samsung, LPD; CGW
26	April 24, 2006	Indonesia	Glass MTPD (M), Samsung (M); CGW

1	May 25, 2006	Malaysia	Bilateral	Samtel; CGW
2	Sept. 5, 2006	Malaysia	Glass	MTPD, Samsung, LPD, Thai CRT; CGW
3	Oct. 12, 2006	Malaysia	Bilateral	Samtel; CGW
4	Nov. 9, 2006	Thailand	Glass	MTPD, Samsung, LPD, and Thai CRT; CGW
5	Nov. 12, 2006	Unknown	Glass	Unknown; CGW
6	Nov. 21, 2006	China Shanghai	China Eight Maker Meeting	BMCC, Irico (Xianyang), SEG Hitachi, Changsha Shuguang, LPD, Nanjing Huafei, Nobel, Samsung, Thomson, Xin Jun; CGW
7	Jan. 23, 2007	China (Shannxi Xi'an)	China Eight Maker Meeting	Irico (Xianyang), Samsung, SEG Hitachi, Changsha LG, Nanjin Huafei, Thomson, BMCC; CGW
8	Feb. 2, 2007	Thailand	Glass	MTPD, Samsung, LPD; CGW
9	Feb. 8, 2007	Thailand	Green	Unknown; CGW
10	March 15-16, 2007	China (Fujian)	China Eight Maker	Samsung, BMCC, LPD, Hitachi, Irico; CGW
11				
12				
13				
14				

15           **C. Examples Of Meeting Discussions Relating To CPTs, CDTs and CRT  
Products.**

16           **1. CPTs.**

17           During the oral proffer, Chunghwa offered some specific examples of agreements among  
18 Defendants with respect to CPTs. These include the following.

19           **The agenda for a September 8, 1998 Management Meeting** attended by Samsung, LG,  
20 Orion, Thai CRT, and CGW contains the following items: [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27

1 In a **May 18, 2004 meeting** (attended by representatives of MTPD, Samsung, LPD, and  
2 Thai CRT), [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 2. CDTs.

23 During the oral proffer, Chunghwa offered some specific examples as to agreements  
24 among Defendants with respect to CDTs. These include the following.  
25

26 \_\_\_\_\_  
27 <sup>4</sup> The “Orion” referred to in the chart below is a Japanese buyer of CPTs, not the Defendant named  
in this case.  
28

1 At a bilateral meeting between Samsung and Chunghwa on November 26, 1996, [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

23 A report on a January 28, 1997 Top Meeting indicates that the attendees from Samsung,  
24 Philips, Orion, and Chunghwa [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
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**At a February 25, 1997 meeting attended by top level employees of Samsung, LG,**

Chunghwa, and Philips, [REDACTED]

**A report on a March 26, 1997 Working Level Meeting among Samsung, Philips, and**

Chunghwa [REDACTED]

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**A June 23, 1999 Top Meeting report** quoted a Philips representative as follows:

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various makers have coordinated very well on 17 inch capacity control in the past

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Similarly, a **May 26, 2000 report of a Management Meeting** attended by Samsung, LG,

Orion, Philips, and Chunghwa states:

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And a **March 19, 2001 report of a Management Meeting** attended by same five companies

states:

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5 Participants at CDT meetings organized a process to audit compliance with the agreed upon output  
6 restrictions. The audit process included visits to factories to ensure compliance with agreed upon  
7 shutdowns.

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██████████ A report of a December 29, 2004 Management

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### 3. Products Containing CDTs and CPTs.

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With respect to products containing CDTs and CPTs, the DPPs learned various types of information from the Chunghwa proffer that caused them to believe that the alleged conspiracy encompassed products containing CDTs and CPTs manufactured and sold by Defendants, including televisions and computer monitors.

*First*, the conspirators fixed the prices on CPTs and CDTs to be applied “internally” within the vertically integrated Defendants that manufactured televisions or computer monitors. Such “internal” transactions accounted for many of CPTs and CDTs produced by the tube divisions or subsidiaries of the vertically integrated Defendants.

During the Chunghwa proffer, documents demonstrating this aspect of the conspiracy were read to DPPs. For example, a report of a January 4, 2002 CDT meeting report for a CDT meeting attended by Samsung, LPD, Orion and Chunghwa ██████████

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28

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1 An October 24, 1996 report of a bilateral meeting between Chunghwa and LG [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 A March 19, 1997 Report of a Management Meeting among Samsung, Philips, Orion,  
12 LG, and Chunghwa states:  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]

18 An April 13, 1999 Report of a Top Meeting among Samsung, LG, Orion, Philips, and  
19 Chunghwa contains the following report from Samsung:  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1  
2  
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4 A June 23, 1999 Top Meeting report [REDACTED]

5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 [REDACTED]  
12  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]

19  
20 A report of a June 28, 2000 Working Level Meeting attended by Samsung, LG, Orion,  
21 Philips, and Chunghwa [REDACTED]

22 [REDACTED]  
23 [REDACTED]

24 A September 21, 2000 Report of a Top Meeting among Samsung, LG, Orion, Philips,  
25 and Chunghwa [REDACTED]

26 [REDACTED]  
27 [REDACTED]  
28

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14

15 **A report of a February 22, 2002 Management Meeting** involving a meeting among  
16 Samsung, LPD, Orion, and Chunghwa notes:

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20

21 **A report of a March 25-27, 2004 Management Meeting** among Samsung, LPD, and

22 Chunghwa states:

23 [REDACTED]  
24 [REDACTED]  
25

26 An internal **Chunghwa memorandum dated July 2, 2004**, [REDACTED]

27 [REDACTED]  
28

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 **4. Discussions of Secrecy**

5 Across all three product groups, the Defendants were concerned about maintaining the  
6 secrecy of their conspiracy. A few representative examples read to DPPs' counsel during the  
7 Chunghwa proffer include the following.

8

9 **A report of a May 23, 2003 Management Meeting** states:

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 **An August 17, 2004 meeting agenda** contains the following subheadings:

16 [REDACTED]

17 [REDACTED]

18

19 **III. INFORMATION OBTAINED FROM OTHER SOURCES.**

20

21 **A. Vertical Integration Of Certain Defendants.**

22

23 Prior to the filing of the DP-CAC, the DPPs also examined whether market conditions  
24 supported the existence of a price-fixing conspiracy. The following facts supported the existence  
25 of a cartel in the United States relating to CRTs and finished products containing CRTs:

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- the existence of a highly concentrated industry (*see* DP-CAC ¶112 ),
- the history of consolidation and joint ventures within the industry (*see id.* ¶¶113-21 )
- significant barriers to entry with no competitive fringe,
- a standardized product with competition primarily on the basis of price,

1           ■ declining demand (*see id.* ¶¶105-09 ),

2           ■ a record of antitrust inquiry, as discussed in further detail below,

3           ■ the fact that a CRT is the major and most expensive part of a display, as discussed in further

4           detail below,

5           ■ vertical integration of many of the manufacturers of both CRTs and products containing

6           CRTs, as discussed in further detail below, and

7           ■ upward movement in, or stabilization of, prices for CRTs and products containing CRTs,

8           despite declining demand (*see id.* ¶¶105-09),

9           In addition to the documents or websites discussed below, sources for this examination

10 included: (a) DisplaySearch's "Quarterly Global TV Shipment & Forecast Reports" (*see*

11 [http://www.displaysearch.com/cps/rde/xchg/displaysearch/hs.xsl/quarterly\\_global\\_tv\\_shipment\\_a](http://www.displaysearch.com/cps/rde/xchg/displaysearch/hs.xsl/quarterly_global_tv_shipment_a)

12 [nd\\_forecast\\_report.asp](http://www.displaysearch.com/cps/rde/xchg/displaysearch/hs.xsl/quarterly_global_tv_shipment_a)); (b) an article in *EE Times* (<http://www.eetimes.com/electronics->

13 [products/other/4084718/Analysts-LCDs-to-finally-dethrone-CRTs](http://www.eetimes.com/electronics-products/other/4084718/Analysts-LCDs-to-finally-dethrone-CRTs)); (c) the Freedonia Group's

14 "Flat Panel & CRT Display Materials: World Markets to 2008" (*see*

15 <http://www.freedoniagroup.com/Flat-Panel-And-Crt-Display-Materials--World-Markets.html>); (d)

16 various articles or reports on individual companies from sources such as their respective websites,

17 *BusinessWeek* online, and Institutional Shareholder Services; (e) the European Display Industry

18 Association's 2005 report on the CRT market (<http://www.eeca.eu/data/File/EDIA/05%20EDIA-Market-Development-2005.pdf>); (e) the Environmental Protection Agency's September 1995

19 "Profile of the Electronics & Computer Industry"

20 (<http://www.epa.gov/compliance/resources/publications/assistance/sectors/notebooks/elecmpsn.pdf>); and (f) the State of Oregon's Department of Environmental Quality's product profile on CRT

21 televisions (<http://www.deq.state.or.us/lq/pubs/docs/sw/ProductProfileTVs.pdf>). Certain

22 Defendants named in the DP-CAC, particularly Hitachi, LG, Panasonic (formerly Matsushita),

23 Philips, Samsung, Tatung/Chunghwa and Toshiba entities, were part of vertically-integrated

24 operations that manufactured CRTs for use in each entity group's televisions or computer

25 monitors that were then sold in the United States. This fact is significant for defining the scope of

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1 the alleged conspiracy. These companies fixed the prices of CPTs and CDTs and had an interest in  
 2 ensuring that their finished products in which these tubes were incorporated would not be sold at  
 3 price levels that would undercut the conspiracy with respect to CDTs and CPTs.<sup>5</sup> As noted above,  
 4 the defendants monitored finished product prices for this purpose. Thus, of necessity, the  
 5 vertically integrated entities had to ensure that their CRT finished products would be sold at price  
 6 ranges consistent with the goals of the alleged conspiracy; it would not be economically plausible  
 7 for them to do otherwise. At each of these vertically integrated companies, the entire corporate  
 8 enterprise was managed in a centralized “top-down” manner that ensured the conspiracy would  
 9 function as to both CDTs and CPTs and the finished products of each company that contained  
 10 them. What follows is a recitation of the publicly-available information from each of the  
 11 aforementioned entity groups that supported this view of the vertically integrated nature of them.

12           **1.       Samsung Entities.**

13       Publicly available sources that existed prior to March of 2009 emphasized the highly  
 14 vertically integrated operation of Samsung's subsidiaries and affiliated companies. One scholarly  
 15 article published in 1997 noted that:

16       But even as they try to exploit local markets, Samsung's Asian affiliates are part  
 17 of a global production network, supplying a considerable number of components  
 18 to Samsung affiliates in Europe and America. Examples include: SEM [Samsung  
 19 Electro-Mechanics Co.] -Thailand which has supplied parts to SEC in Europe,  
 20 Brazil and Korea; SED [Samsung Electron Devices Co.] has exported 14-inch  
 21 CRTs to Mexico; SEC-Indonesia has assembled PCBs for a Portugal based VCR  
 22 plant; and SED-Malaysia has been supplying electron-guns for CRTs to SED-  
 23 Germany, and SED-Mexico.

24       <sup>5</sup> The DPPs reasonably relied on *Royal Printing Company v. Kimberly-Clark Corp.*, 621 F.2d 323  
 25 (9th Cir.1980) (“*Royal Printing*”), in which the Ninth Circuit held that “[*Illinois Brick* [Co. v.  
 26 *Illinois*, 431 U.S. 270 (1977) (“*Illinois Brick*”)] does not bar an indirect purchaser's suit where the  
 27 direct purchaser is a division or subsidiary of a co-conspirator.” 621 F.2d at 326. The Ninth Circuit  
 28 explained that *Illinois Brick*'s rationale of preventing potentially duplicative recoveries from both  
 29 direct and indirect purchasers does not apply where the direct purchaser is an affiliate of the  
 30 corporation accused of an antitrust violation. *Id.* See *In re TFT-LCD Antitrust Litig.*, No. M 07-  
 31 1827 SI, 2009 WL 533130 at \*1 (N.D. Cal. March 3, 2009) (“TFT-LCD Tatung Opinion”) (so  
 32 interpreting *Royal Printing* and denying motion by Tatung Corporation, the parent of Chunghwa,  
 33 to dismiss the direct purchasers' amended complaint).

1 Youngsoo Kim, "Technological Capabilities And Samsung Electronics' International Production  
 2 Network In Asia" (Nov. 1997) (available at <http://brie.berkeley.edu/publications/WP106.pdf>) at  
 3 31.

4 Similarly, in a 2006 scholarly article, it was noted that:

5 For the vertical integration and promotion of R&D capability, Samsung relied on  
 6 foreign companies, mostly Japanese companies. Within a year period from the  
 7 establishment of the SEC, Samsung established two companies to produce  
 8 electronic parts, namely the Samsung-Sanyo (December 1969: later merged with  
 9 the SEC) and Samsung-NEC (January 1970; later to be the Samsung SDI). In  
 10 1973, Samsung established two more affiliates, namely Samsung-Sanyo Parts  
 11 (later to be Samsung Electro-Mechanics: SEM) and Samsung Corning. With this,  
 12 within 4 year period, a system of vertical integration in electronics industry was  
 13 formed with all in one location of Suwon city which is still the main hub of  
 14 Samsung's electronics business. Division of labor among them is such that the  
 15 SEC (with acquisition of the Samsung Sanyo) play the role of the final assembler  
 16 and three others supplying key parts and components to the SEC, with Samsung  
 17 SDI (Vacuum Tubes, Black & White CRTs and later color CRTs to SEC) and the  
 18 SEM (all kinds of electronic parts, such as deflection yokes, transformers and  
 19 condensers) at the middle and finally Samsung Corning at the bottom (glass bulbs  
 20 for CRTs).

21 Related to the development of R&D capability is to be noted the fact that in all of  
 22 these new affiliates, Samsung had at least half of the equity ownership and  
 23 gradually bought out the foreign equity shares. Thus, apart from the first three  
 24 years of the venture with Corning, all ventures were under Samsung's  
 25 management control (SC, 1994).

26 Keun Lee & Xiyou Hee, "Capability of the Samsung Group in Project Execution and Vertical  
 27 Integration: Creating in Korea And Replicating In China" (Nov. 2006) (available at  
 28 <http://ebab.rutgers.edu/samsung-bg-6.pdf>) at 13.

29 The DPPs made a similar point in their opposition to Defendants' motions to dismiss:

30 Samsung SDI is part of what Samsung itself calls the "Samsung Group."  
 31 [http://www.samsung.com/hk\\_en/aboutsamsung/samsunggroup/affiliatedcompanies/SAMSUNGGroup\\_AffiliatedCompanies.html](http://www.samsung.com/hk_en/aboutsamsung/samsunggroup/affiliatedcompanies/SAMSUNGGroup_AffiliatedCompanies.html). The companies within this group  
 32 are closely interrelated and operate interactively. Indeed, Samsung's own website  
 33 goes on to state:

34 SAMSUNG electronics subsidiaries include SAMSUNG Electronics, SAMSUNG  
 35 Electro-Mechanics, SAMSUNG SDI, SAMSUNG Corning, SAMSUNG SDS,  
 36 SAMSUNG Networks and SAMSUNG Corning Precision Glass. These affiliates  
 37 produce, market, and sell a wide variety of electronic parts and components such  
 38 as next generation memory chips, computer and telecommunications equipment,  
 39 color TV picture tubes, and glass bulbs. They also develop computer systems and  
 40 produce general electronics and precision machines.

1 All these companies share the same goal of becoming world-class, high-tech  
 2 companies at the beginning of the 21st century and are concentrating their  
 3 investments into promising future fields to achieve that target. Despite being  
 4 independent, systematic cooperation takes place between the companies that  
 5 enable the development of state-of-the-art electronic products.  
[http://www.samsung.com/hk\\_en/aboutsamsung/samsunggroup/affiliatedcompanies/SAMSUNGGroup\\_ElectronicIndustries.html](http://www.samsung.com/hk_en/aboutsamsung/samsunggroup/affiliatedcompanies/SAMSUNGGroup_ElectronicIndustries.html).

6 This was equally true in earlier years. As one scholar has noted in a 2003 publication:

7 “Samsung Electronics is closely interlinked with Samsung SDI, a manufacturer of  
 8 television tubes, which in turn relies on Samsung Corning, which produces glass  
 9 bulbs for the tubes, as indicated by the fact that 61% of its total revenue comes  
 10 from Samsung SDI. Samsung SDI, in turn, supplies 52% of its products to  
 11 Samsung Electronics.”

12 Sea-Jin Chang, *Financial Crisis And Transformation of Korean Business Groups*  
 13 at 118-20 (Cambridge University Press, 2003).

14 “Direct Purchaser Plaintiffs’ Combined Opposition To Defendants’ Motion To Dismiss,” pp. 62-  
 15 63 (Aug. 3, 2009) (Dkt. No. 531).

16 Samsung’s own annual reports (available at  
<http://www.samsung.com/us/aboutsamsung/ir/financialinformation/annualreport/>) underscore this  
 17 close integration. Its 2001 Annual Report, for example, discusses at pages 38, 39 and 40 the  
 18 success of its global Enterprise Resource Planning (“ERP”) system, which began in 1995:

19 In 2001, we completed a global ERP [system spanning 25 production facilities  
 20 and 31 sales subsidiaries in 47 countries. This global IT infrastructure provides a  
 21 solid, extensible platform for business process solutions spanning the entire  
 22 supply chain, revolutionizing the way we relate to and work with partners,  
 23 suppliers, and customers.

24 \*\*\*\*

25 In August 2001, we took a major step forward in this area as we wrapped up a six-  
 26 year, 700 billion won project to implement a global ERP system as the backbone  
 27 of our e-business infrastructure. Connecting us with our 56 production and sales  
 28 subsidiaries outside of Korea, our global SAP R/3 system gives us access to real-  
 time information on production, sales, logistics, and inventory, enabling us to  
 manage our resources on a truly worldwide basis, a capability that few other firms  
 have.

\*\*\*\*

We started by upgrading our global ERP system with an APS solution to support  
 a weekly planning cycle for demand forecasting, resource management, and  
 production planning functions for our entire global network of 32 production

1 facilities and 49 sales subsidiaries. This upgrade is enabling us to better  
 2 synchronize production and sales, a capability we expect to boost  
 3 on-time delivery performance by more than 10% in 2002. We also added a  
 4 number of advanced tools to facilitate integration with our partners, suppliers, and  
 5 customers. For our partners, we implemented a collaborative product commerce  
 6 solution that is providing a synergistic collaborative framework to lower costs,  
 7 foster innovative design, and dramatically shorten time  
 8 to market. For our suppliers, we began implementation of a supplier relationship  
 9 management solution that will enable us to create, execute, and sustain global  
 10 sourcing strategies as we build win-win relationships.

11 The same report notes at pages 66-67 the existence of Samsung's "Global Network."

12 Samsung's 2006 Annual Report at page 74 notes the following control exercised by the  
 13 parent company over its subsidiaries:

14 The consolidated financial statements include the accounts of SEC [Samsung  
 15 Electronics Corp.] and its controlled subsidiaries (collectively referred to as "the  
 16 Company"). Controlled subsidiaries include majority-owned entities and entities  
 17 in which SEC owns more than 30% of the total outstanding voting stock and is  
 18 the largest shareholder. Percentage of ownership is the sum of the percentage of  
 19 direct and indirect ownership.

20 The same report notes the following at page 82 with respect to companies in which SEC has less  
 21 than a 30% stake:

22 In the consolidated financial statements of the Company, investments in business  
 23 entities in which the Company has the ability to exercise a significant influence  
 24 over the operating and financial policies are accounted for using the equity  
 25 method of accounting.

26 Various Samsung SDI entities, including those named as Defendants here, fall in this latter  
 27 category.

28 Likewise, an SEC 2005 Analyst Day presentation (available at  
[http://www.samsung.com/us/aboutsamsung/ir/ireventpresentations/analystday/downloads/analyst\\_20051103\\_1500.pdf](http://www.samsung.com/us/aboutsamsung/ir/ireventpresentations/analystday/downloads/analyst_20051103_1500.pdf)) refers to CRTs (*id.* at 24-25), describes its global manufacturing network (*id.* at  
 29 42), and refers to its "Global Supply Chain Planning in Partnership with Retail Channel" (*id.* at  
 30 43).

31 Thus, the Samsung entities were well-situated to carry out the overarching conspiracy with  
 32 respect to CRT Products, as defined in the DP-CAC.

## 2. Hitachi Entities.

The same is true with respect to the Hitachi family of companies.

3 In Hitachi, Ltd.’s 2000 Form 20-F filed with the Securities & Exchange Commission  
4 (available at <http://www.hitachi.com/IR-e/library/20F/2000/index.html>), it explained at page 3 that  
5 in April of 1999, it implemented “fundamental management reforms” by creating a new company  
6 officer system, reorganizing business units, simplifying its head office, and creating an Advisory  
7 Board. In November of 1999, Hitachi, Ltd. rationalized its global business into five centrally-  
8 controlled segments: (1) Information Systems & Electronics; (2) Power & Industrial Systems; (3)  
9 Consumer Products; (4) Materials; and (5) Systems & Others.

10 Hitachi Ltd.'s 2001 Form 20-F (available at <http://www.hitachi.com/IR-e/library/20F/2001/index.html>) further explained this centrally-controlled business segmentation  
11 (id. at 11):

13 Hitachi conducts a broad and diverse range of businesses. Hitachi divides its  
14 operations into five segments that group products mainly on the basis of  
15 similarity of products and services in type, use, production method and marketing  
16 method. The five segments are Information Systems & Electronics, Power &  
Industrial Systems, Digital Media & Consumer Products, Materials and Services  
& Other. Each segment includes the Company's subsidiaries and affiliates  
engaged in related production, marketing and service activities.

17 The company's CDT business was part of its Information Systems & Electronics segment, which  
18 also included computers (*id.* at 8); “[t]his segment groups products with many common  
19 technological aspects, facilitating operations management. Computers and semiconductors form  
20 the nucleus of the segment” (*id.* at 12).<sup>6</sup>

23       <sup>6</sup> Hitachi Ltd.’s 2007 Business Plan (available at <http://www.hitachi.com/IR-e/library/presentation/070418/070418.pdf>), which focused on Thin-Film Transistor Liquid Crystal  
24       Display (“TFT-LCD”) screens, refers to “[q]uickly captur[ing] benefits from vertical integration”  
25       and “[c]aptur[ing] synergies in the Hitachi Group (Materials, components, finished products)” and  
26       “collaborative cooperation” with Matsushita on plasma. There is no reason to believe that Hitachi  
Ltd. viewed its CRT Products business any differently.

### 3. Toshiba Entities.

2 The same is true with respect to the Toshiba entities, as reflected in Toshiba Corporation's  
3 ("TC") annual reports (available at <http://www.toshiba.co.jp/about/ir/en/library/ar/ar2010.htm>).  
4 Toshiba Corporation's 2002 Annual Report states at page 27 that:

Toshiba Group consists of Toshiba Corporation and 315 consolidated subsidiaries (201 domestic companies and 114 foreign companies) as well as 52 companies reflected under the equity method (consisting of 28 domestic and 24 foreign companies). The net number of consolidated subsidiaries for the period under review was 14 companies less than the previous year. The number of newly consolidated subsidiaries, including our strategic joint venture with Matsushita Electric Industrial in the LCD and liquid crystal business—Toshiba Matsushita Display Technology—increased by 31 companies during the year. However, as the result of restructuring efforts, we also consolidated, rationalized and sold-off some 45 subsidiaries.

11 The degree of integration did not lessen appreciably after the creation of MTPD. Toshiba's  
12 2003 report listed MTPD at page 40 as an "affiliated company." A contemporaneous Matsushita  
13 press release (available at <http://www.panasonic.net/ir/relevant/en030129-6/en030129-6.html>)  
14 indicated that the following personnel from Toshiba Corporation became officers or directors of  
15 MTPD: Eisaburo Hamano (became Senior Executive Vice-President of MTPD), Kazumasa  
16 Uchida (became Corporate Auditor of MTPD), Taketoshi Shimoma (became a Director of  
17 MTPD), Hisashi Matsuda (became a Director of MTPD), and Tadashi Matsumoto (became a  
18 Director of MTPD). TC's website still has a listing for Toshiba Display Devices, Inc. ("TDD"),  
19 which manufactured CRTs for TC. See <http://www.toshiba.com/tdd/>. Bloomberg still lists TDD as  
20 a subsidiary of Defendant Toshiba America Electronics Corporation.

#### 4. Panasonic/Matsushita Entities

Panasonic (formerly Matsushita) also has highly integrated operations with respect to CRT Products. In its 2000 Annual Report (available at <http://panasonic.net/ir/annual/index.html>), Panasonic stated the following at pages 3, 4, 7-8 and 19:

As part of the Progress 2000 Plan launched in 1997 to provide a solid foundation for future growth, Matsushita implemented a number of business reforms, including the introduction of the internal divisional company system and the selection and strengthening of strategic areas, such as our five key businesses, to

1 concentrate resources. As a result, Matsushita's five key businesses now play an  
 2 essential role in the operations of the Company as a whole.  
 3 \*\*\*\*

4 To adapt to changing market needs and maximize growth, Matsushita has  
 5 reclassified its business segments and implemented a number of related strategies.  
 6 Particularly in the areas of AV equipment and information and communications  
 7 equipment, where broadcasting and communications are rapidly converging,  
 8 Matsushita is committed to building a unified strategy to take full advantage of its  
 9 combined Groupwide strengths. As a result, from April 2001 the Company  
 10 established four new business segments: AVC Networks, Home Appliances,  
 11 Industrial Equipment, and Components and Devices. These replace the traditional  
 12 Consumer Products, Industrial Products and Components segments. The four new  
 13 segments will facilitate strategic development of business activities.  
 14 \*\*\*\*

15 To implement better strategic operational management in semiconductors and  
 16 display devices—areas involving huge investments—the Company absorbed  
 17 Matsushita Electronics Corporation (MEC), effective April 2001. By establishing  
 18 new internal divisional companies within the parent Company, namely the  
 19 Semiconductor, Display Device and Lighting companies, the development,  
 20 manufacturing and sales functions that were previously performed by both  
 21 Matsushita and MEC for each of these strategic businesses have been integrated.  
 22 \*\*\*\*

23 Regarding the domestic consumer sales structure, Matsushita replaced what were  
 24 the corporate consumer products sales divisions, sales functions within individual  
 25 product divisions and the Advertising Division with two new divisions for our  
 26 major brands, the Corporate Panasonic Marketing Division and Corporate  
 27 National Marketing Division. Concerning distribution reforms, Matsushita plans  
 28 to consolidate its 22 regional consumer sales companies  
 into a single company. Further reforms will include the consolidation of several  
 logistics companies into a single company, as well as a similar integration of  
 credit sales and leasing subsidiaries. By implementing these reforms and  
 reevaluating domestic consumer sales and distribution operations, Matsushita will  
 create a highly efficient structure that ensures speedy response to customer needs,  
 and will benefit from a significant reduction in distribution costs with an  
 increased market share. Another important aspect of these reforms is the  
 reallocation of a large number of employees to high-growth and new  
 service-related businesses, thereby optimizing human resources.  
 \*\*\*\*

29 Similarly, operations for CRTs, LCD devices and PDPs, formerly divided  
 30 between Matsushita and MEC, were consolidated under a new display devices  
 31 divisional company within Matsushita, thus facilitating overall management  
 32 decision making and optimal resource allocation among the three product lines.  
 33 \*\*\*\*

34 A September 26, 2002 press release available at Panasonic's website

35 (<http://panasonic.net/ir/relevant/en020926-13/en020926-13.html>) noted that this integration  
 36 continued after the creation of MTPD:

37 Matsushita and Toshiba plan to integrate their CRT business operations, including  
 38 research and development, manufacturing, and sales. The integration will cover  
 39 \*\*\*\*

1 both companies' manufacturing operations worldwide, except for those in Japan  
 2 where the parent companies will continue to run their respective factories. They  
 3 include Matsushita's factories in China, the United States, Germany, and  
 4 Malaysia, and Toshiba's factories in the United States, Thailand, and Indonesia.  
 5 The new company will also take over as its wholly owned subsidiary MT Display  
 6 Procurement Co., Ltd., a joint procurement company established with equal  
 7 ownership by the two parent companies on April 15, 2002.

5 **5. Philips Entities.**

6 The Philips 2001 Form 20-F filed with the Securities & Exchange Commission (available  
 7 at [http://www.sec.gov/cgi-bin/browse-  
 8 edgar?company=&CIK=0000313216&filenum=&State=&SIC=&owner=include&action=getcom  
 9 pany](http://www.sec.gov/cgi-bin/browse-edgar?company=&CIK=0000313216&filenum=&State=&SIC=&owner=include&action=getcompany)) sets forth at pages 10 and 20 the high degree of vertical integration within its family of  
 10 companies:

11 In addition to streamlining its portfolio of businesses and management,  
 12 Philips engaged in a comprehensive review of its strategy and portfolio,  
 13 involving the focus on high growth technology businesses. In consequence, as of  
 14 January 1, 2000, Philips has grouped together the relevant operations of Sound &  
 15 Vision, Philips Consumer Communications and Business Electronics into a single  
 16 Consumer Electronics organization. Given that the technologies of TV, audio,  
 17 telecommunications and computing are increasingly converging, these  
 18 combinations are appropriate. It is expected that they will capitalize on the  
 19 strength of the Philips brand and make new business generation easier, market  
 20 intelligence more coordinated and time-to-market shorter.

21 Besides Consumer Electronics, there are other very important building  
 22 blocks that make up the Company. The Semiconductors and Components  
 23 divisions play a crucial role, both as internal suppliers and through their leading  
 24 positions in the external market. The capital expenditures required in this  
 25 field place considerable demands on management in terms of ensuring adequate  
 26 returns by means of flexible and cost-effective operations.

27 \*\*\*\*

28 Philips and LG Electronics of South Korea announced in November 2000  
 29 the signing of a letter of intent pursuant to which the companies expect to  
 30 merge their respective cathode ray tube (CRT) businesses into a new 50-50 joint  
 31 venture company. The transaction is expected to close in 2001 and is subject to  
 32 customary regulatory approvals. Upon the closing of the transaction, LG will  
 33 receive USD 1.1 billion from the new company to address the difference in the  
 34 valuation of the contributed businesses.

35 Under the terms of the letter of intent, LG and Philips will share equal control of  
 36 the joint venture.

1 A scholarly treatise also noted how Philips was buying much of its CPTs internally for use  
 2 in its branded televisions. Robert M. Grant, *Contemporary Strategy Analysis* at 393 (5th ed. 2005).

3 The situation did not change appreciably once LPD was created. In a 2005 press release  
 4 available from its website, LGPD was crowing about providing a SuperSlim CRT to LG  
 5 Electronics for its televisions. A 2002 LG Electronics presentation (available at  
 6 <http://www.lg.com/global/download/pdf/lehman-brothers-conference.pdf>) also referred to  
 7 “Vertical integration-Ability to leverage product development of Display and Media Tech  
 8 divisions.”

9 **6. LG Entities**

10 As reflected in LG Electronics’ 1999 Annual Report (available at  
 11 <http://www.lg.com/global/ir/reports/annual-reports.jsp>), the company was divided into three  
 12 separate product companies: Digital Display, Digital Appliance and Digital Media. The first of  
 13 these, which encompassed the manufacture of CRT Products, “conducts R&D and manufacturing  
 14 in digital display products and their core components. It has 7,500 employees at its four domestic  
 15 operations and 20 overseas subsidiaries. Besides its Display Device Research Lab., it has other  
 16 research centers and a marketing network at home and abroad.” These included the Zenith  
 17 Electronics Corporation in the United States, which manufactured CRT televisions. The same  
 18 annual report further explained: “[t]he Company has organized three reportable business divisions  
 19 : Display division, Home Appliances division and Multimedia division. Additionally,  
 20 the Company has a centralized supporting division to provide general and administrative,  
 21 marketing and sales and research and development services to each business division.”

22 **7. Tatung and Chunghwa**

23 As Judge Illston explained in the TFT-LCD Tatung Opinion,

24 Here, plaintiffs have submitted evidence showing that Tatung Taiwan owns and  
 25 controls both TUS [Tatung U.S.] and CPT [Chunghwa] and that the three firms  
 26 have intertwined economic interests; that TUS has described itself as a subsidiary  
 27 of Tatung Taiwan, represented that it owns its own TFT-LCD panel factory (which  
 28 is CPT’s factory), and stated that it runs a vertically-integrated TFT-LCD business;  
 CPT and other defendants supply TFT-LCD panels to TUS; and TUS has never  
 sued Tatung Taiwan or CPT. TUS disputes this evidence, or at least disputes  
 plaintiffs’ characterization of the evidence. For example, TUS asserts that it has

1 never purchased more than 50% of its LCD panels from CPT in any given year,  
 2 and that TUS engages in arms-length negotiations with all of its suppliers of LCD  
 3 panels, including CPT. TUS also argues that the testimony of TUS executives  
 4 Edward Chen and Michael Lai demonstrates that neither CPT nor Tatung Taiwan  
 5 exercises financial or operational control over TUS.  
 6

7 The Court finds that the complaint sufficiently alleges a basis for TUS's liability.  
 8 The factual record is disputed as to the relationship between TUS, CPT, and Tatung  
 9 Taiwan, as well whether TUS's purchases of LCDs and finished products  
 10 containing LCDs was truly arms-length or in furtherance of the alleged conspiracy.  
 11 On this record, TUS has not shown that it is not a proper defendant under *Royal*  
 12 *Printing and Freeman [v. San Diego Ass'n of Realtors*, 322 F.3d 1133, 1144 (9th  
 13 Cir. 2003).] Upon a fuller factual record, TUS may renew its arguments in a motion  
 14 for summary judgment.

15 2009 WL 533130 at \*4 (footnote omitted).

16 In sum, the vertically integrated Defendants necessarily had to capture the overcharge in  
 17 the prices of the finished products that they sold to putative class members.<sup>7</sup>

18 \_\_\_\_\_  
 19 <sup>7</sup> That is not to say that non-integrated entities, who supplied CDTs or CPTs to other co-  
 20 conspirators, but did not make finished products, can avoid antitrust liability. As said in *Florida*  
 21 *Power Corp. v. Granlund*, 78 F.R.D. 4412, 443-44 (M.D. Fla. 1978):

22 But the Section 4 claim does not exhibit a total lack of merit. The Court is of the  
 23 opinion that the Supreme Court's opinion in *Illinois Brick Co. v. Illinois*, 431 U.S.  
 24 720, 97 S.Ct. 2061, 52 L.Ed.2d 707 (1977), does not foreclose the State from  
 25 bringing a complaint against Florida Power. Florida Power characterizes the  
 26 holding of *Illinois Brick* as follows:

27 . . . the direct purchaser of a price-fixed product is the only proper party to recover  
 28 for the overcharges on that product. Plaintiff's Reply Memorandum at 2.

29 Closely examined, the proposition proves too much. It would immunize from  
 30 antitrust liability any manufacturer who conspired with his suppliers to fix the  
 31 price of the supplied raw material. *Illinois Brick* does not mention, let alone  
 32 discuss, such a situation. The Supreme Court's obvious concern for the efficacious  
 33 enforcement of the antitrust laws, which so informed its decision (*id.* 431 U.S.  
 34 720, 97 S.Ct. at 2074-75), further sufficiently indicates the lack of any intention  
 35 so to immunize such a manufacturer. The mere fact that the allegedly price-fixed  
 36 product is only a partial constituent of the ultimate product purchased by the  
 37 intervening plaintiff as alleged here, where the oil is converted to electricity  
 38 should not bar recovery, where there is an allegation of privity between suppliers  
 39 of the raw material and the manufacturer. *See Note, Scaling the Illinois Brick*  
 40 *Wall: The Future of Indirect Purchasers in Antitrust Litigation*, 63 Cornell L.Rev.  
 41 309, 331-32 (1978). The result would be a loophole in the antitrust laws that  
 42 would provide immunity for any price-fixing manufacturer which, for whatever  
 43 reasons, finds it useful to conspire to fix prices with its suppliers. The Court  
 44 cannot believe that the Supreme Court intended such a result without discussing  
 45 it.

46 (footnote continued)

1                   **B.        Involvement Of Certain Defendants In Related Conspiracies.**

2                   Prior to the filing of the DP-CAC, the DPPs were aware that certain of the Defendants here  
 3 had pled guilty to a conspiracy involving the global fixing of prices for TFT-LCDs. On November  
 4 12, 2008, the United States Department of Justice (“DOJ”) announced that LG Display, an alleged  
 5 wrongdoer in this case, had pled guilty to an information alleging antitrust price-fixing allegations  
 6 with respect to TFT-LCDs and had agreed to pay a \$400 million. *See*  
 7 [http://www.justice.gov/atr/public/press\\_releases/2008/239396.pdf](http://www.justice.gov/atr/public/press_releases/2008/239396.pdf). In January and February of  
 8 2009, it was announced that C.Y. Lin (Chunghwa PT’s former Chairman and CEO); Wen Jung  
 9 Cheng (Assistant Vice-President of Marketing & Sales for Chunghwa PT); Duk Mo Koo  
 10 (Executive Vice-President & Chief Sales Officer for LG.Philips LCD Co., Ltd.); Chang Suk  
 11 Chung (Vice-President of Monitor Sales for LG Display, Ltd., the predecessor of LP Display);  
 12 Chih-Chun Liu (Chunghwa PT’s Vice-President of LCD Sales); and Hsueh-Lung Lee (also one of  
 13 Chunghwa PT’s Vice-Presidents of LCD Sales) pled guilty to participation in the TFT-LCD  
 14 conspiracy; Wen Jung Cheng (Assistant Vice-President of Marketing & Sales for Chunghwa PT)  
 15 and Duk Mo Koo (Executive Vice-President & Chief Sales Officer for LG.Philips LCD Co., Ltd.)  
 16 have also been indicted in connection with the DOJ’s TFT-LCD investigation. *See*  
 17 <http://www.justice.gov/opa/pr/2009/February/09-at-092.html>. On March 10, 2009, the DOJ  
 18 announced that Hitachi Displays, Ltd., another Defendant in this case, had pled guilty to  
 19 participation in the price-fixing conspiracy involving TFT-LCDs and had agreed to pay a \$31  
 20 million fine. *See* [http://www.justice.gov/atr/public/press\\_releases/2009/243414.pdf](http://www.justice.gov/atr/public/press_releases/2009/243414.pdf). As reflected  
 21 in the discussion above of materials such as the September 21, 2000 Top Meeting report, CRT  
 22 finished product prices were sometimes conspiratorially pegged off of collusively set TFT-LCD  
 23 Product prices. Indeed, the district court in the TFT-LCD civil class case had refused to dismiss  
 24 antitrust claims based on purchases of products containing TFT-LCD panels in an opinion issued

25

26

27

28

1 on August 25, 2008. *In re TFT-LCD (Flat Panel) Antitrust Litig.*, 586 F.Supp.2d 1109, 1117-19  
 2 (N.D. Cal. 2008) (“LCDs”).

3 The DPPs also had available to them a consent decree of the Japanese Fair Trade  
 4 Commission (“JFTC”), reported at 1993 WLNR 1116859. That report reads as follows:

5 The Fair Trade Commission Wednesday ordered four sales subsidiaries of the  
 6 country's four major home electronics appliance makers to stop the price-fixing  
 7 practice of illegally restricting the amount of discounts displayed on their  
 products by large discount stores.

8 This is the first time that the FTC has charged home appliance makers with  
 9 suspicion of violating the Antimonopoly Law.

10 The FTC's decision is expected to draw much attention not only in Japan but  
 overseas, because of the exclusive business practices among Japanese home  
 11 appliance makers and their unclear way of setting retail prices.

12 These practices came under criticism during in the Structural Impediments  
 Initiative (SII) talks between Japan and the United States.

13 The four subsidiaries are: Matsushita Electronics, a 100 percent holding company  
 14 of Matsushita Electric Industrial Co.; Hitachi Sales Corp., Sony Network Sales  
 Co., and Toshiba East Japan Life Electronic Co.

15 According to the FTC's investigation, the four sales subsidiaries requested large  
 16 discount stores in the Akihabara district in Tokyo and the Nipponbashi shopping  
 17 district in Osaka not to display discount rates larger than 10 percent of the maker's  
 recommended retail prices on price tags at stores and in their handbills.

18 They reportedly forced the stores to comply with their demand by threatening to  
 stop shipment of products.

19 As a result, the offering prices of color TVs, refrigerators and word processors on  
 20 their handbills and price tags became exactly the same, which the FTC has ruled  
 21 violates a provision of the Antimonopoly Law banning the illegal restriction of  
 retailers' sales methods.

22 The FTC noted that large discount stores were actually offering discount rates  
 bigger than the ones they displayed on the price tags.

23 But emphasizing that the prices listed on the price tags and handbills served as  
 24 important sources of information for consumers, the FTC said there is concern  
 25 that the retail prices may be maintained at high levels by the restriction on the  
 display of selling prices, which gives damage to the public.

26 The home appliance industry has been hard-hit by the recession, and the profits of  
 manufacturers and their licensed retail stores as well as large discount stores have  
 27 been dropping.

1 The FTC suspects that the restriction of the displayed selling prices had also  
 2 helped the retail stores keep selling prices at a high level, and contributed to the  
 3 escalating price-cutting competition among discount shops, it added.  
 4

5 In 1988, the FTC instructed the two major industry associations, including the  
 6 Japan Electronics Industry Association, to stop the practice. But when there was  
 7 no visible improvement in the situation, the FTC started to search the sales  
 8 subsidiaries of the four major home appliance makers to collect evidence  
 9 beginning in March last year.  
 10

11 All the four sales subsidiaries have voluntarily lifted the restriction on the  
 12 displayed selling prices after the FTC's investigation.  
 13

14 Domestic sales of home appliances is estimated at 5 yen to 6 trillion yen a year,  
 15 and about 60 percent of home appliances manufactured in Japan are shipped to  
 16 large discount stores.  
 17

18 The combined total of the four major makers' sales to large discount stores  
 19 amounted to about 800 billion yen.  
 20

21 The last time that the home appliance industry was ordered to stop price-fixing by  
 22 the FTC was in 1971, when Matsushita Electric Industrial Co. was found trying to  
 23 force retailers to sell its products at its recommended prices.  
 24

25 While this misconduct involved vertical price-fixing of televisions in Japan prior to the class  
 26 period in this case, it is relevant to the pleading of the alleged wrongdoing here, which is also  
 27 based on a horizontal agreement, implemented in part through the efforts of the vertically  
 28 integrated Defendants with respect to CRT Products, including televisions.  
 29

### 30 C. Antitrust Investigations Or Prosecutions With Respect To CRT Products.

31 On February 10, 2009, prior to the filing of the DP-CAC, the DOJ announced the  
 32 indictment of the aforementioned C.Y. Lin of Chunghwa PT in connection with a conspiracy to fix  
 33 the prices of CDTs and CPTs. (Chunghwa, it will be remembered, did not manufacture finished  
 34 products containing CRTs). The agency's press release making that announcement (available at  
 35 <http://www.justice.gov/opa/pr/2009/February/09-at-110.html>) stated that customers in the United  
 36 States were harmed:  
 37

38       *"This conspiracy harmed countless Americans who purchased computers and  
 39 televisions using cathode ray tubes sold at fixed prices," said Scott D. Hammond,  
 40 Acting Assistant Attorney General in charge of the Antitrust Division. "The  
 41 Antitrust Division will continue to prosecute individuals, wherever they are  
 42 located and however high their position on the corporate ladder, who engage in  
 43 price fixing aimed at U.S. businesses and consumers." (Emphasis added).*  
 44

1 The DPPs reasonably interpreted that press release as indicating that the overarching conspiracy  
 2 involving CRT Products encompassed televisions and computer monitors sold in the United  
 3 States. The district court in this case also read it in a similar manner. *In re Cathode Ray Tube*  
 4 (*CRT*) *Antitrust Litig.*, No. CV 07-5944 SC, 2010 WL 3632775 at \*8 (N.D. Cal. March 30, 2010).

5 Prior to the filing of the DP-CAC, the DPPs also had information on investigations by  
 6 competition authorities other than the DOJ. On November 8, 2007, it was reported that EC  
 7 officials carried out unannounced raids on manufacturers of CRTs based on suspected  
 8 anticompetitive conduct. That same day, the EC issued a press release stating that, "[t]he  
 9 commission has reason to believe that the companies concerned may have violated EU rules  
 10 against price-fixing, sharing markets or exchanging market information."

11 <http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/07/453>.

12 On November 9, 2007, Matsushita (now Panasonic) and Samsung reported that they were  
 13 cooperating with the JFTC, which raided the companies' CRT production facilities on suspicion of  
 14 anticompetitive conduct.

15 On that same day, a Samsung spokesperson announced that its CRT subsidiary in South  
 16 Korea was being investigated by the Korean Fair Trade Commission ("KFTC") as "part of an  
 17 international probe into alleged price-fixing."

18 And on November 21, 2007, Philips acknowledged that it was being investigated as well.  
 19 <http://www.itworld.com/071121philipscrt>. The *International Herald Tribune* reported that  
 20 "competition authorities in several jurisdictions had started investigations," and that the company  
 21 "would assist regulators."

22 On May 6, 2008, the Hungarian Competition Authority ("HCA") announced its own  
 23 investigation into the CRT cartel. <http://www.jogiforum.hu/hirek/17724#axzz16n0dDfHD>. The  
 24 HCA described the cartel as follows and included among its targets entities that manufactured (or  
 25 controlled the manufacture of) finished CRT Products:

26  
 27 The Hungarian Competition Authority (Gazdasági Versenyhivatal - GVH)  
 28 initiated a competition supervision proceeding against the following undertakings:  
 Samsung SDI Co. Ltd, Samsung SDI Germany GmbH, Samsung SDI

1 Magyarország Zrt., Thomson TDP sp. Z.o.o., LG Philips Displays Czech  
 2 Republic s.r.o., LP Displays, Chunghwa Pictures Tubes (UK) Ltd, Chunghwa  
 3 Pictures Tubes Ltd, Daewoo Orion S.A., Daewoo Electronics Global HQ,  
 4 Daewoo Electronics European HQ, MT Picture Display Germany GmbH,  
 5 Matsushita Global HQ, Matsushita European HQ.  
 6

7 Based on the data available the undertakings mentioned above concerted their  
 8 practice regarding the manufacturing and distribution of cathode-ray tubes  
 9 (including coloured pictures tubes and coloured screen tubes) on the European  
 10 market between 1995 and 2007. The anti-competitive behavior may have  
 11 concerned the exchange of sensitive market information (about prices, volumes  
 12 sold, demand and the extent to which capacities were exploited), price-fixing, the  
 13 allocation of market shares, consumers and volumes to be sold, the limitation of  
 14 output and coordination concerning the production. The undertakings evolved a  
 15 structural system and functional mechanism of cooperation.

16 According to the available evidences it is presumable that the coordination of  
 17 European and Asian undertakings regarding to the European market also included  
 18 Hungary from 1995 to 2007. The coordination concerning the Hungarian market  
 19 allegedly formed part of the European coordination. Samsung SDI Magyarország.  
 20 was called into the proceeding since it manufactured and sold cathode-ray tubes in  
 21 Hungary in the examined period, and it allegedly participated in the coordination  
 22 between its parent companies.

23 **D. A Conspiracy As To CRTs Is Equivalent To A Conspiracy As To Finished  
 24 CRT Products.**

25 In addition, Class Plaintiffs were well aware prior to the filing of the DP-CAC how the  
 26 costs of a CRT would affect the price of a finished CRT Product, like a television. They knew this  
 27 from aspects of the Chunghwa proffer discussed above. They also knew it independently through  
 28 published sources, such as DisplaySearch's "Quarterly Global TV Shipment & Forecast Report"  
 dated March 17, 2007, which (at page 20) calculated prices for CRT televisions by using the prices  
 for CRTs: "[t]o calculate the CRT TV price, we used the previous quarter's tube prices to  
 determine the current quarter's CRT TV street prices due to the lag between tube shipment and TV  
 shipment. Thus, tube price reductions are reflected in street prices one quarter later." (As noted  
 above, these reports are available at

[http://www.displaysearch.com/cps/rde/xchg/displaysearch/hs.xsl/quarterly\\_global\\_tv\\_shipment\\_and\\_forecast\\_report.asp](http://www.displaysearch.com/cps/rde/xchg/displaysearch/hs.xsl/quarterly_global_tv_shipment_and_forecast_report.asp).

29 As pointed out above, Class Plaintiffs also knew from LCDs that where a defendant sells a  
 30 finished product containing a price-fixed component, it can be held liable with respect to the sale  
 31

1 of that finished product to the first entity outside the conspiracy. As Judge Illston explained in  
 2 *LCDs*:

3 Here, the complaint alleges that the direct purchaser plaintiffs  
 4 purchased TFT-LCD products directly from cartel members at  
 5 supra-competitive prices as the result of a conspiracy to fix prices.  
 6 ... Defendants do not cite any case holding that a plaintiff who  
 7 purchases directly from an alleged cartel does not have standing. In  
 8 contrast, courts have found antitrust standing where plaintiffs  
 9 purchased downstream goods from a cartel of manufacturers who  
 10 made, and fixed the price of, a component of those goods. See,  
 11 e.g., *In re Linerboard Antitrust Litig.*, 305 F.3d 145, 159-60 (3d  
 12 Cir.2002) ("*Linerboard I*") (in alleged conspiracy to fix prices of  
 13 linerboard, plaintiffs who purchased corrugated sheets or boxes  
 14 containing linerboard directly from defendants had standing). To  
 15 the extent that defendants raise questions about the scope of the  
 16 market, or contend that damages will be difficult to ascertain, the  
 17 Court finds that these are factual questions that are better addressed  
 18 on a fuller record, and not at the pleadings stage. *See In re Sugar*  
 19 *Industry Antitrust Litig.*, 579 F.2d 13, 17 (3d Cir.1978) [“*Sugar*”]  
 20 (“As the defendants here point out, the product which plaintiff  
 21 purchased competes not with sugar, but with other candy, and more  
 22 than one ingredient determines the price. To this extent, there will  
 23 be some additional complications underlying the damage claims.  
 24 However, this must not be allowed to obscure the fact that the  
 25 plaintiff did purchase directly from the alleged violator.”).

26 586 F.Supp.2d at 1118-19. *See Sugar*, 579 F.2d at 18 (“[p]laintiff is a direct purchaser and,  
 27 therefore, entitled to recover the full extent of the overcharge”); *In re Linerboard Antitrust Litig.*,  
 28 203 F.R.D. 97, 216 (E.D. Pa. 2001), *aff'd*, 305 F.3d 145, 161-62 (3d Cir. 2002), *cert. denied sub*  
*nom. Gaylord Container Corp. v. Garrett Paper Co.*, 538 U.S. 977 (2003) (“[l]ike the candy in *In*  
*re Sugar Industries* which contained allegedly price fixed sugar, the corrugated sheets and boxes  
 29 contain linerboard that was subject to an agreement on output, which is equivalent to a price-fixing  
 30 agreement. ... The plaintiffs are direct purchasers and, therefore, are entitled to recover the full  
 31 amount of any overcharge”); *In re Flat Glass Antitrust Litig.*, 191 F.R.D. 472, 480  
 32 (W.D.Pa.1999) (“[a]s an initial matter, we note that defendants' reliance on *Illinois Brick* is  
 33 misplaced, as plaintiffs' claims are limited to those persons who purchased fabricated products  
 34 directly from defendants or their parents, subsidiaries or affiliates. Moreover, the Court of Appeals  
 35 [in *Sugar*] has held that, although *Illinois Brick* bars Clayton Act suits by persons who are not  
 36 direct purchasers from an antitrust defendant, the decision does not preclude a suit by a plaintiff  
 37

1 who purchases directly from the alleged offender, as did plaintiffs, but buys a product which  
2 incorporates the price-fixed product as one of its ingredients") (emphasis in original).

3 **INTERROGATORY NO. 2:**

4 State with specificity the factual basis (including any evidentiary sources) for Your  
5 allegation that Defendants agreed to allocate market shares and customers of sales of computer  
6 monitors containing CRTs, as alleged in, inter alia, Paragraphs 5 and 138 of the Complaint.

7 **RESPONSE TO INTERROGATORY NO. 2:**

8 Subject to the General Objections, plaintiffs respond as follows:

9 See answer to Interrogatory Number 1 above.

10 **INTERROGATORY NO. 3:**

11 For each separate defendant (regardless of its affiliation with any other defendant), state  
12 with specificity the factual basis (including any Documents, Persons, or other evidentiary sources)  
13 for Your allegations that it conspired, combined, and contracted with any of the other Defendants  
14 to fix, raise, maintain and/or stabilize the prices of computer monitors containing CRTs sold in the  
15 United States, as alleged in, inter alia, Paragraph 3 of the Complaint.

16 **RESPONSE TO INTERROGATORY NO. 3:**

17 Subject to the General Objections, plaintiffs respond as follows:

18 See answer to Interrogatory Number 1 above.

19 **INTERROGATORY NO. 4:**

20 For each separate defendant (regardless of its affiliation with any other defendant), state  
21 with specificity the factual basis (including any Documents, persons, or other evidentiary sources)  
22 for Your allegations that it agreed to allocate market shares and customers of sales of computer  
23 monitors containing CRTs, as alleged in, inter alia, Paragraphs 5 and 138 of the Complaint.

24 **RESPONSE TO INTERROGATORY NO. 4:**

25 Subject to the General Objections, plaintiffs respond as follows:

26 See answer to Interrogatory Number 1 above.

27 **INTERROGATORY NO. 5:**

1 Identify each Person who provided information to answer these Interrogatories.

2 **RESPONSE TO INTERROGATORY NO. 5:**

3 Subject to the General Objections, plaintiffs respond as follows:

4 Counsel for plaintiffs.

5 DATED: January 31, 2011

6 By: /s/ Guido Saveri  
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9 *Interim Lead Counsel for the Direct  
10 Purchaser Plaintiffs*

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